# Complaint Counsel's Motion for Summary Decision Oral Argument Materials

In re Intuit Inc., Docket No. 9408



"[Y]ou can file on TurboTax for absolutely nothing."



"At least your taxes are free."



"That's right.
TurboTax Free is free.
Free, free free free
free."



"And free, and free, and free, and free, and free."



Tolling Date Jan. 5, 2022

Class Action Prelim.

Chair Meeting March 24, 2022

FTC Complaint March 28, 2022

State AVC April 28, 2022

2017

2019

2021

2016

2018



2020

"Free. Free free. Free!."



"TurboTax Absolute Zero lets you file your taxes for free."

People v. Intuit (LA City) filed May 6, 2019

First FTC CID June 28, 2019

People v. Intuit (Santa Clara) filed, Sept. 6, 2019

2022

**Ads Continue** 



"And free and a free here and a free free free a free free free."



GX 321, 2015 Super Bowl Ad



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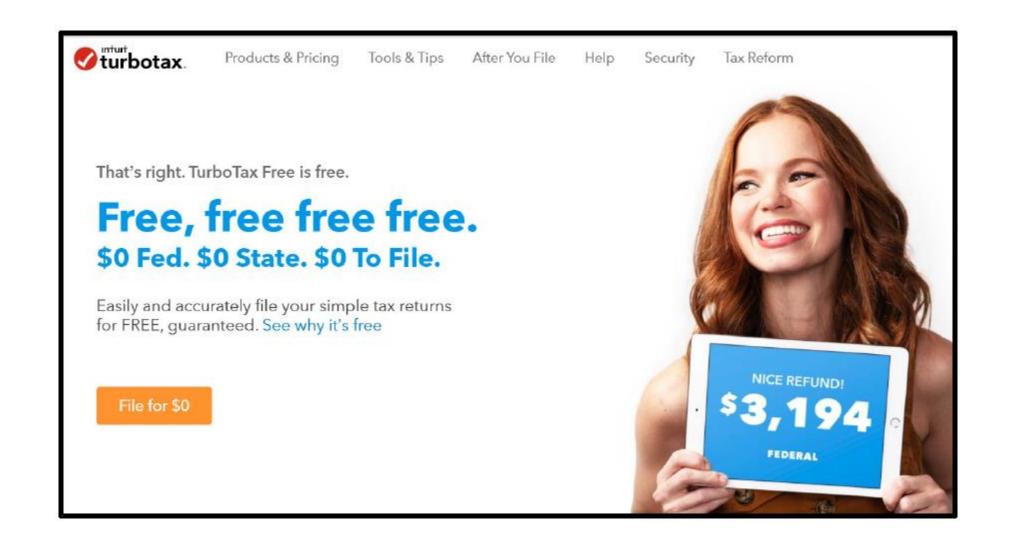
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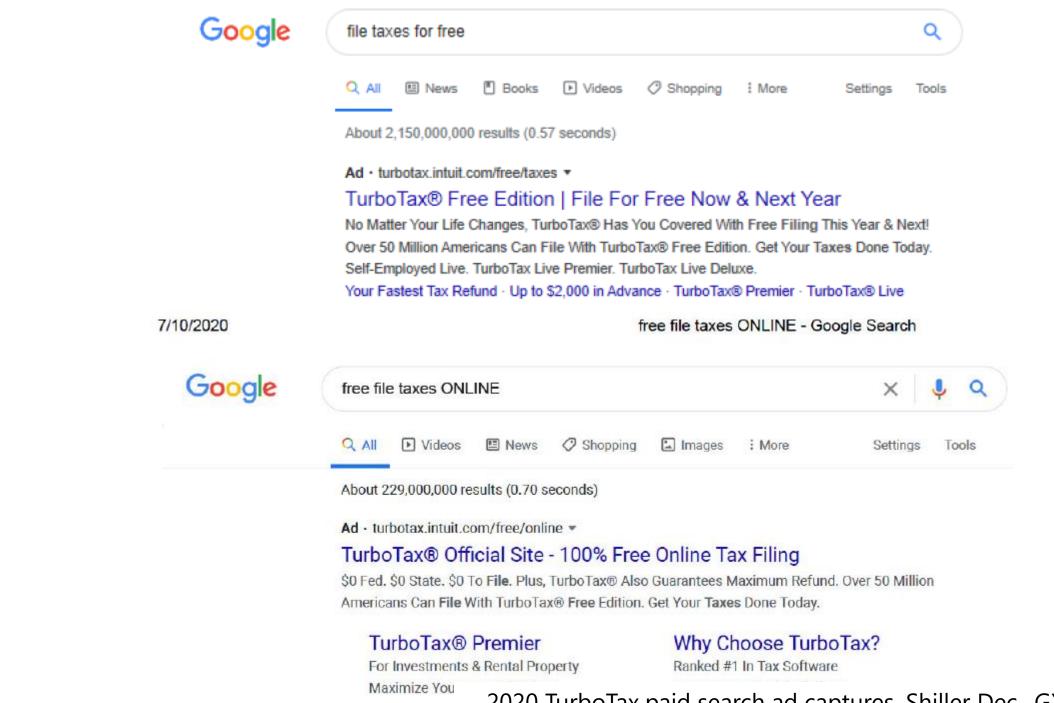
People v. Intuit (Santa Clara) filed, Sept. 6, 2019

2022

**Ads Continue** 



"And free and a free here and a free free free a free free free."



2020 TurboTax paid search ad captures, Shiller Dec., GX 342, ¶¶ 98-99

Ad · turbotax.intuit.com/free/efile \*

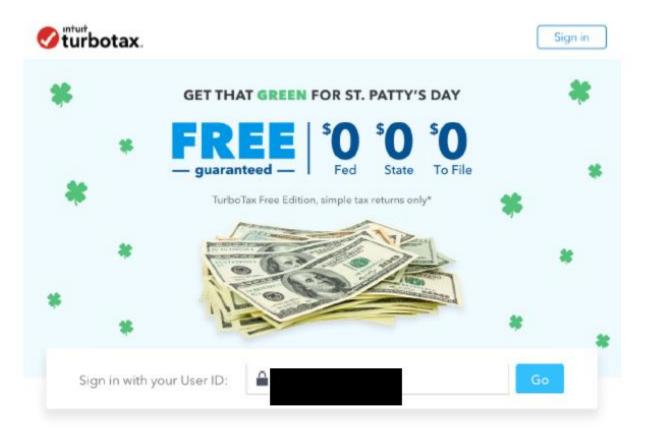
Why (

### TurboTax® Free Tax Filing - E-file Your Taxes For Free

Fast, Easy And 100% Free Tax Filing With TurboTax®. \$0 Federal. \$0 State. \$0 To File. Over 50 Million Americans Can File With TurboTax® Free Edition. Get Your Taxes Done Today.

2020 TurboTax paid search ad captures, Shiller Dec., GX 342, ¶¶ 100-101



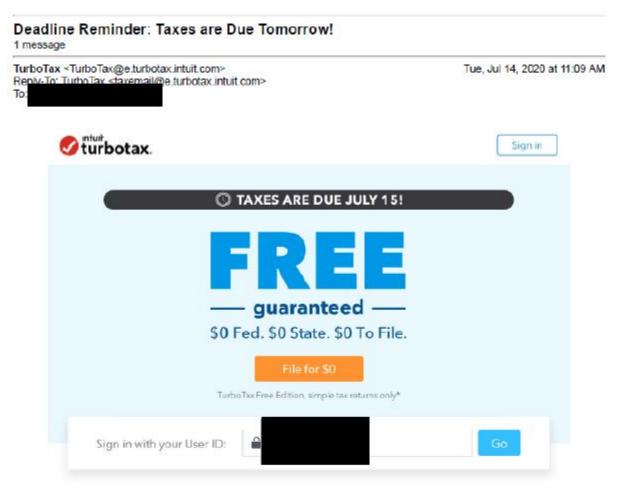


### Spring is in the air and refunds are on their way

Do your taxes for FREE! The IRS is sending refunds out every day — the sooner you file, the faster you'll get yours. Get started today!

Sign in now

2020 TurboTax email ad capture, Shiller Dec., GX 342, ¶ 102



### Your taxes are due July 15. File today.

Give TurboTax another shot — it's never been easier to file your taxes for free. Import your W-2, answer simple questions about your life and we'll get you your max refund — guaranteed! File for \$0.

Get a jump-start with last year's tax return

2020 TurboTax email ad capture, Shiller Dec., GX 342, ¶ 103







\$0 Fed. \$0 State. \$0 To File.

Get up to a 50% head start to save time

Transfer last year's info from TurboTax or another preparer for free, and your simple tax returns can be well on their way to complete.

File for \$0





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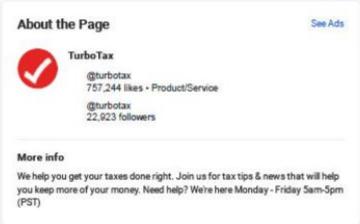
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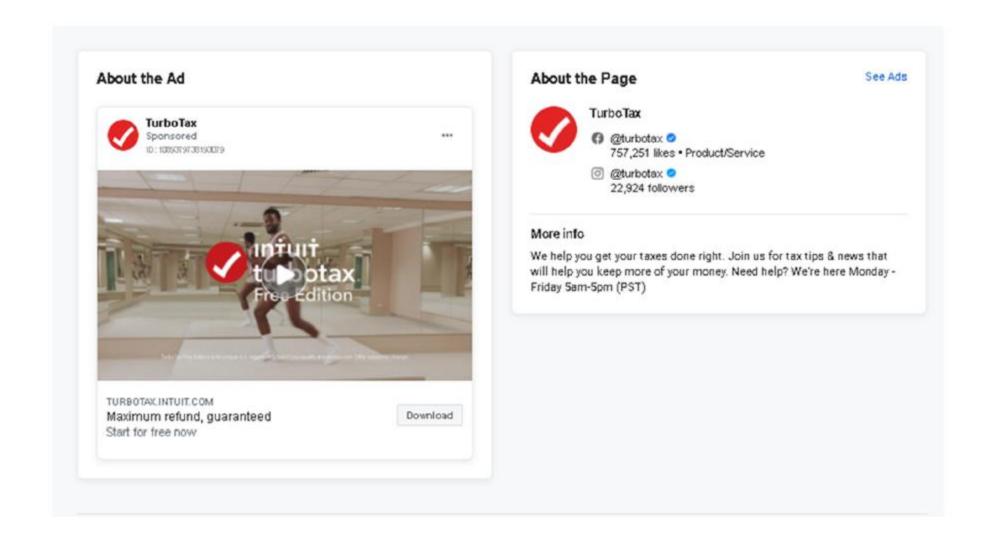
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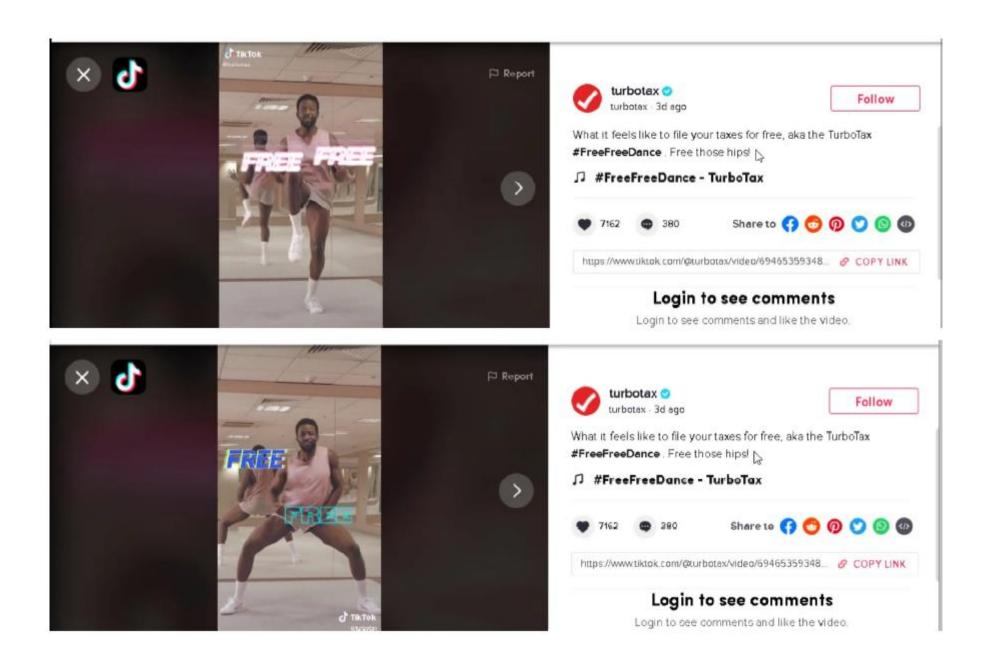


"And free and a free here and a free free free a free free free."

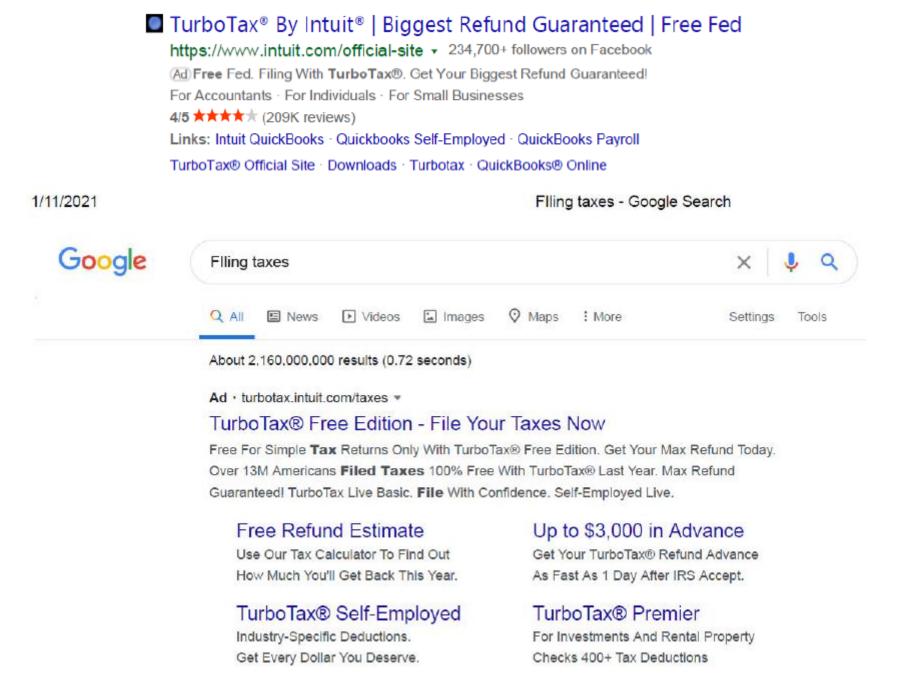




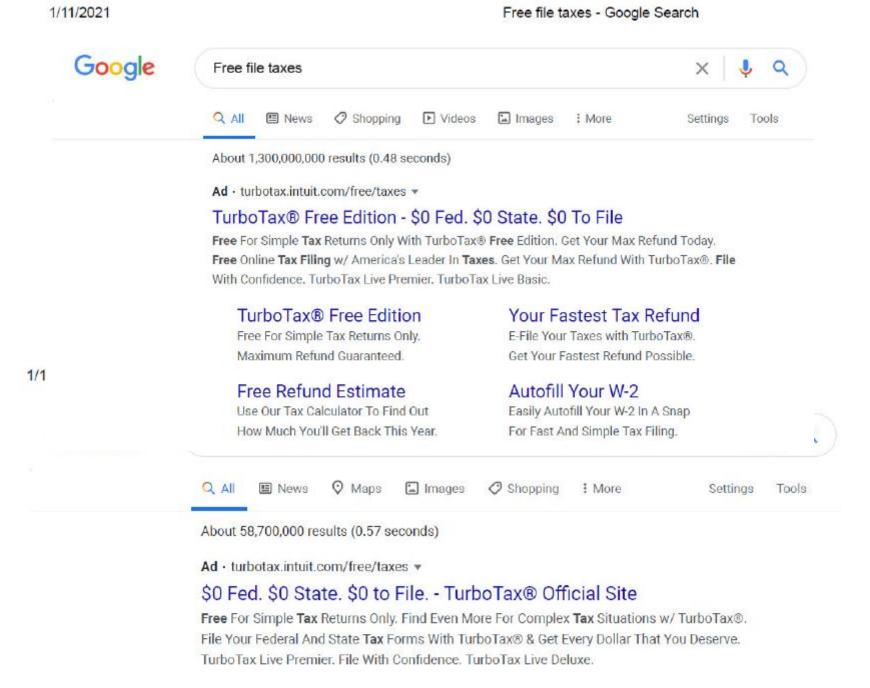




2021 TurboTax Facebook ad capture, Shiller Dec., GX 342, ¶ 117



2021 TurboTax paid search ad captures, Shiller Dec., GX 342, ¶¶ 118-19



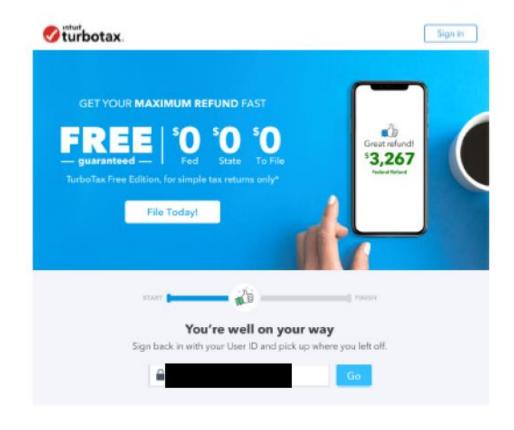
2021 TurboTax paid search ad captures, Shiller Dec., GX 342, ¶¶ 120-21

## \*\*\* (Please Sign in to Your Account) E-File With Direct Deposit for Your Fastest Refund

Received: Friday, January 15, 2021 7:26 PM

From: TurboTax TurboTax@em1.turbotax.intuit.com

To:



TurboTax is now accepting e-file

There's no faster way to get your refund than when you e-file today

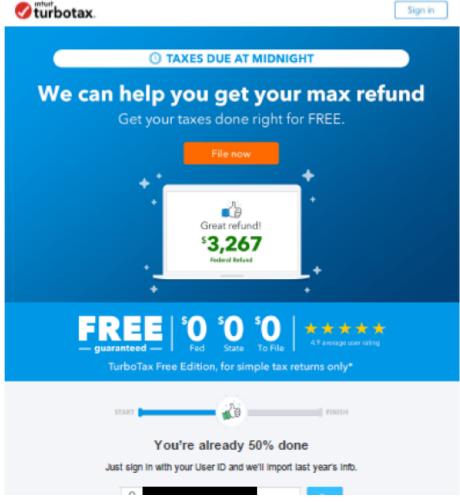
and above the distance I also finish on the PDFF

## ■ Last Chance To File - Tax Deadline is Here!

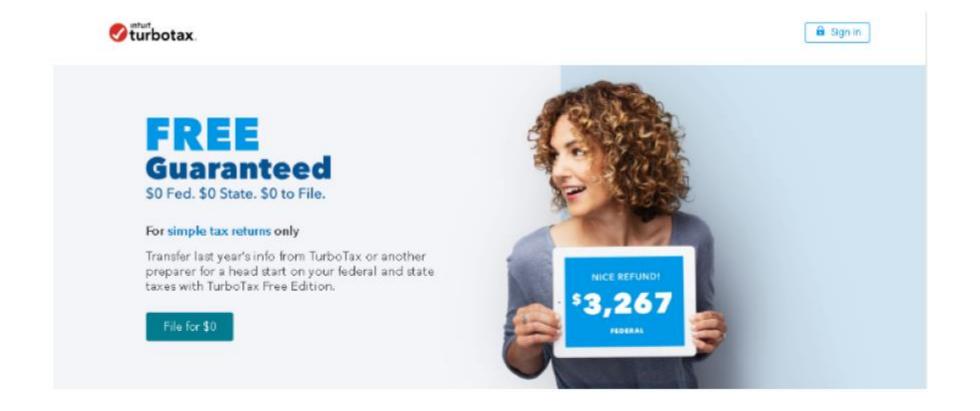
Received: Monday, May 17, 2021 6:23 AM

From: TurboTax TurboTax@e.turbotax.intuit.com

To:



2021 TurboTax email ad capture, Shiller Dec., GX 342, ¶ 123





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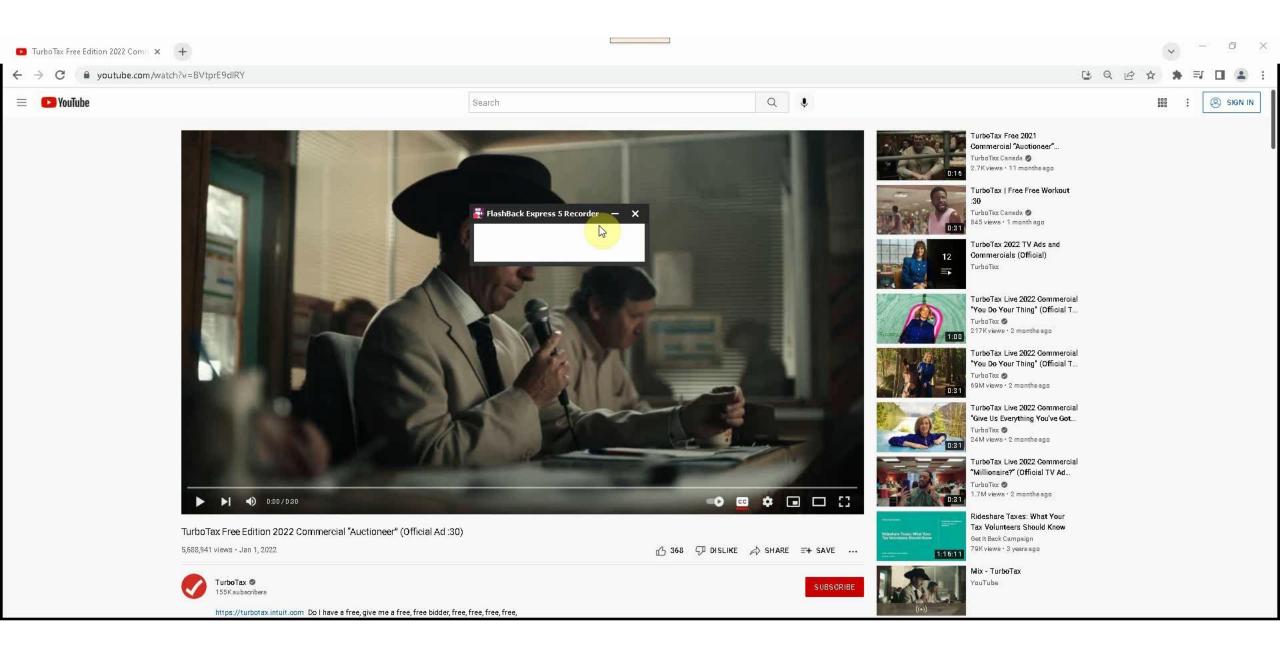
People v. Intuit (Santa Clara) filed, Sept. 6, 2019

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**Ads Continue** 

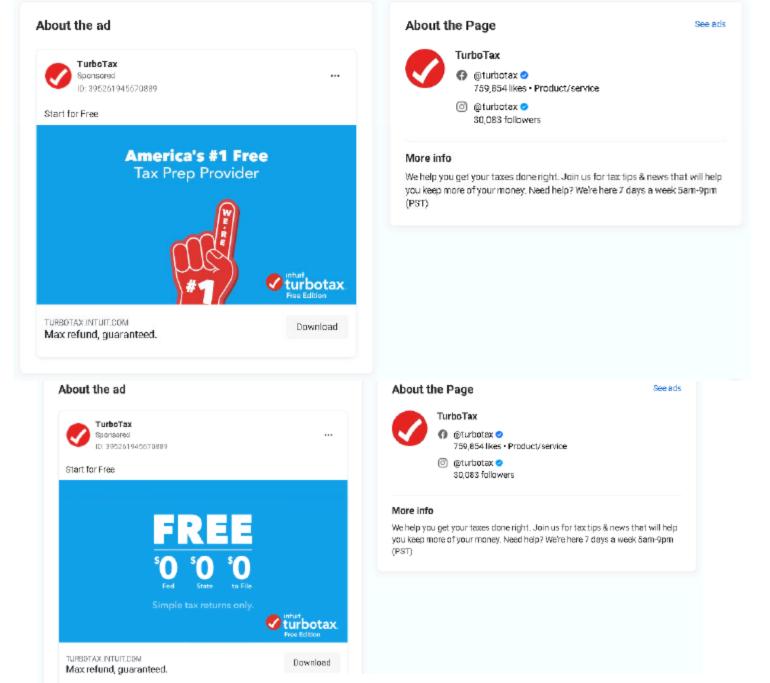


"And free and a free here and a free free free a free free free."

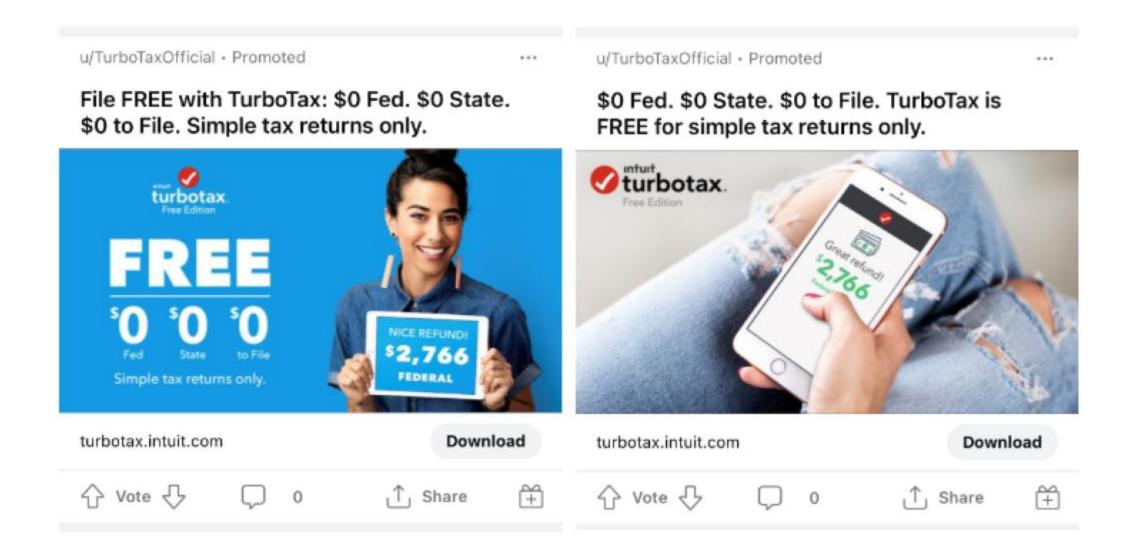


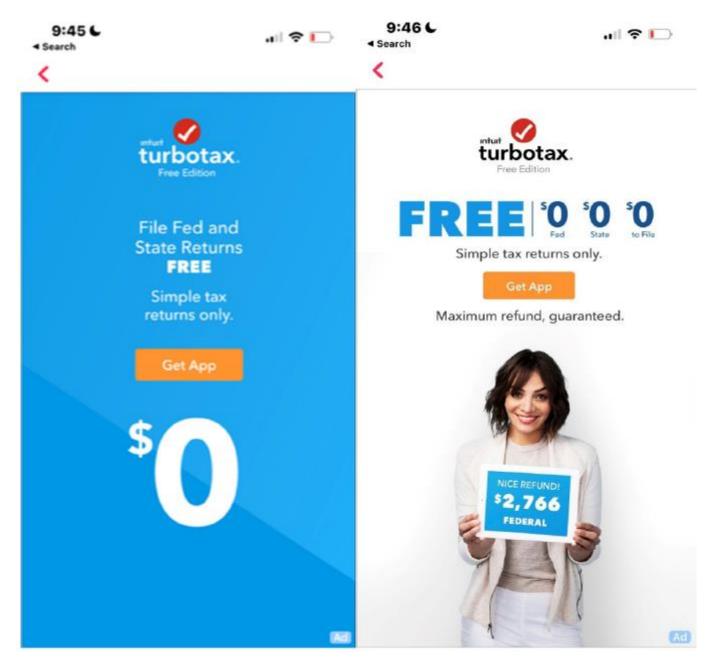
GX 200, "Auctioneer," 2022, YouTube



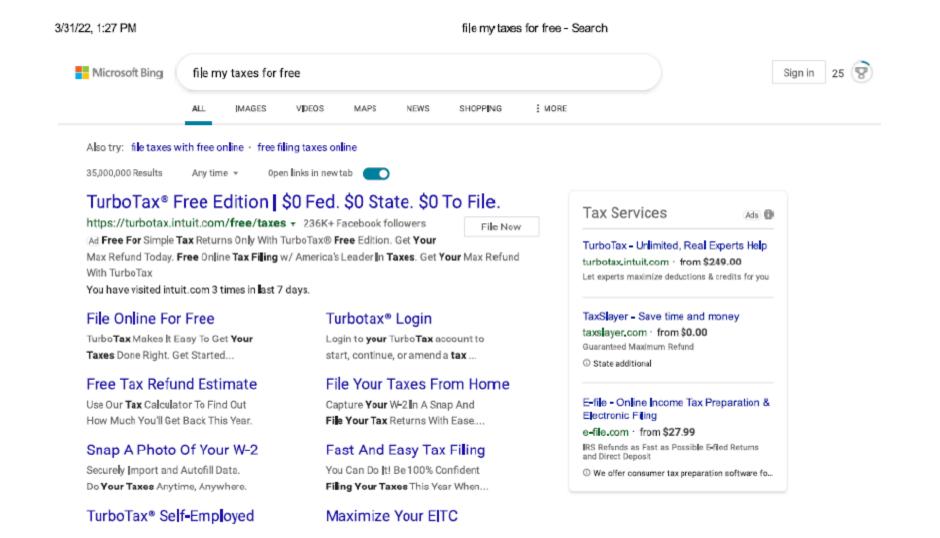


2022 TurboTax website capture, Shiller Dec., GX 342, ¶ 159





2022 TurboTax Apple News ad captures, Shiller Dec., GX 342, ¶ 161



### Free Tax Refund Estimate

Types: CD/Download Products, Mobile App, Online Products, Small Business Taxes

Use Our **Tax** Calculator To Find Out How Much You'll Get Back This Year.

### Snap A Photo Of Your W-2

Securely Import and Autofill Data.

Do Your Taxes Anytime, Anywhere.

### TurboTax Live®

Connect With A Live Tax Expert

For Tax Advice And A Final Review.

### TurboTax® Premier

For Filers Who Sold Investments. Effortlessly Import Your Tax Info

See results only from intuit.com

### PCMag Editors' Choice

7-Time Winner Of Best **Tax** Software Try Us To Find Out Why

### TurboTax® Self-Employed

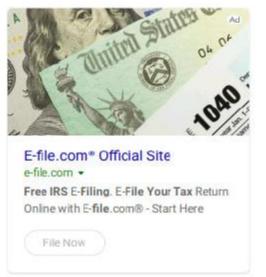
Review Industry-Specific Deductions Get Every Dollar You Deserve.

### Advance Child Tax Credit

Claim Your Child Tax Credit And Get Your Max Refund, Learn More.

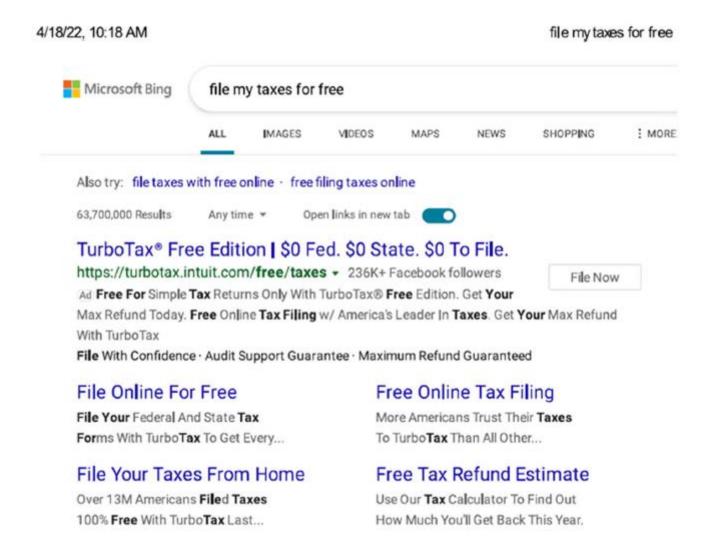
### Maximize Your Tax Refund

Get Every Dollar You Deserve When You File With TurboTax®, File Now!

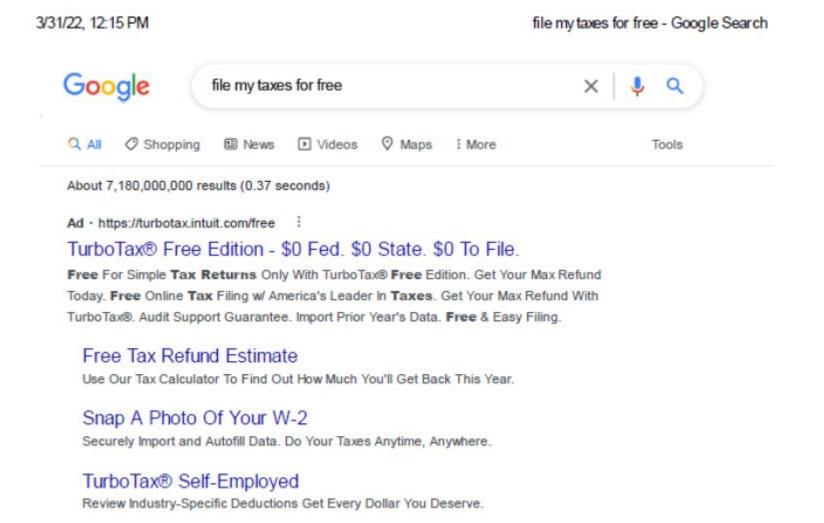


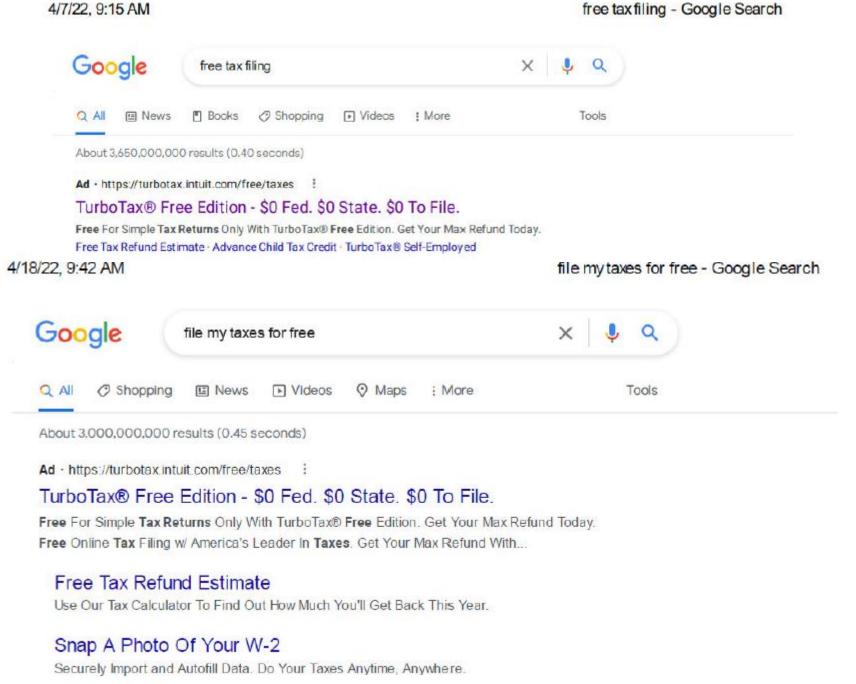
Sign in

2022 TurboTax paid search ad capture, Shiller Dec., GX 342, ¶ 164

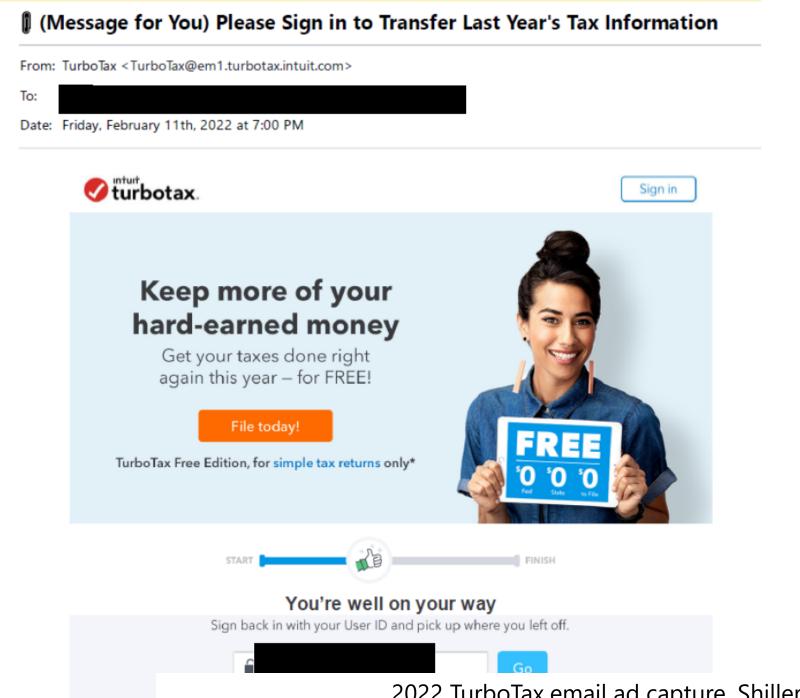


2022 TurboTax paid search ad capture, Shiller Dec., GX 342, ¶ 165

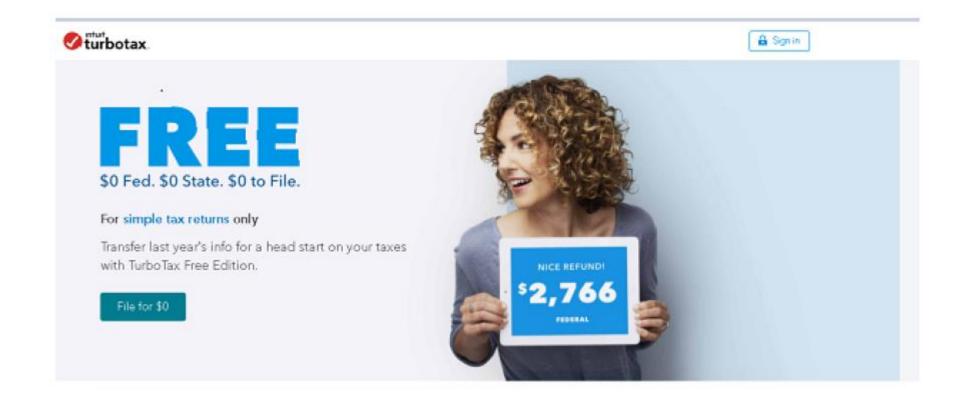


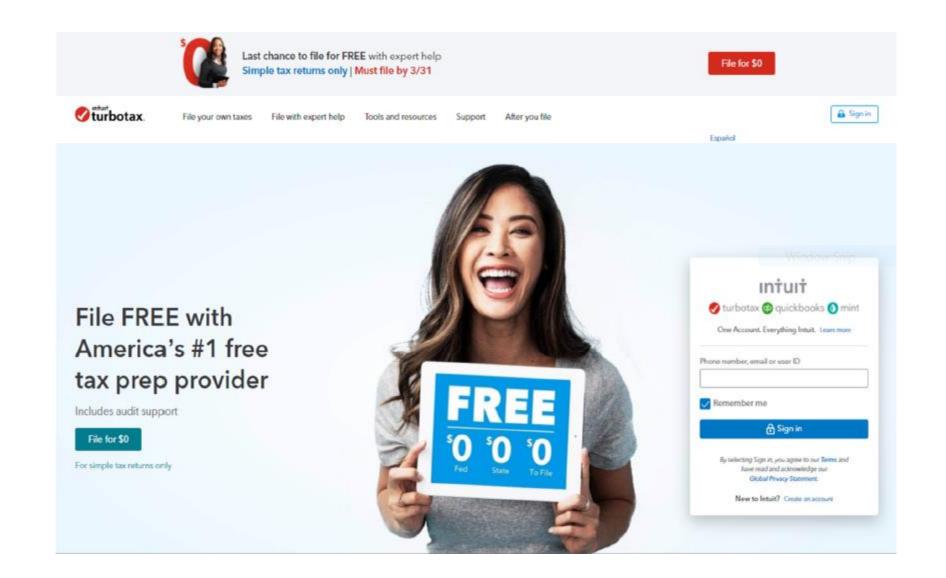


2022 TurboTax paid search ad captures, Shiller Dec., GX 342, ¶¶ 167-68

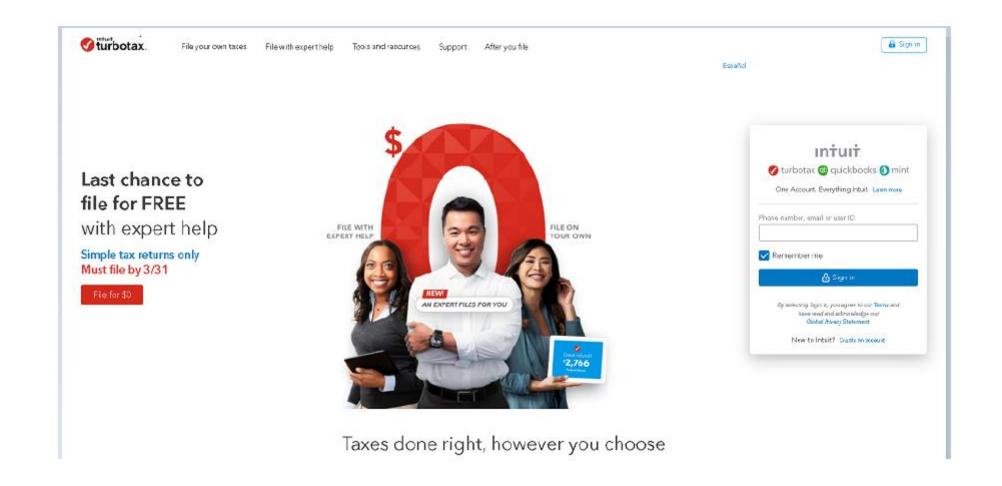


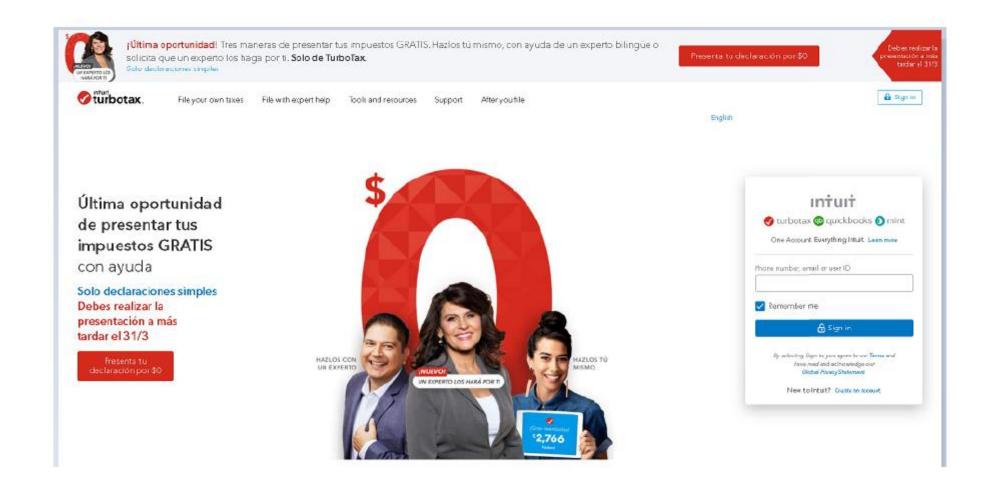
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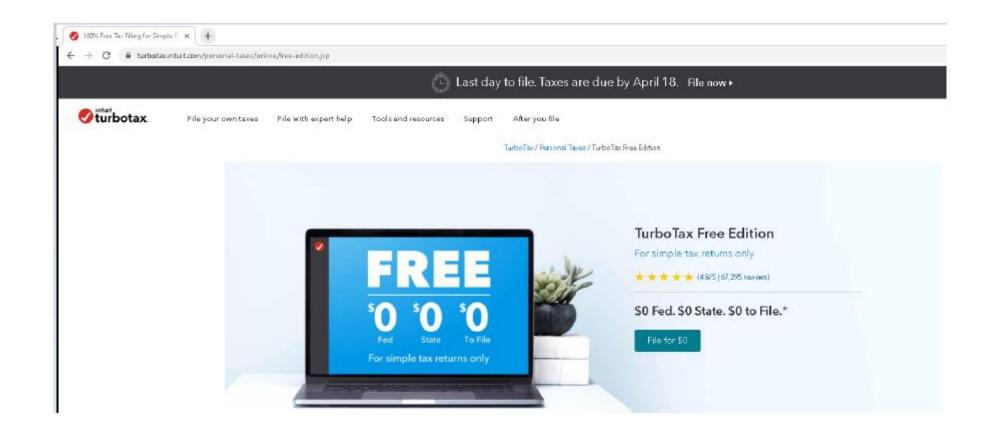




2022 TurboTax website capture, Shiller Dec., GX 342, ¶ 190









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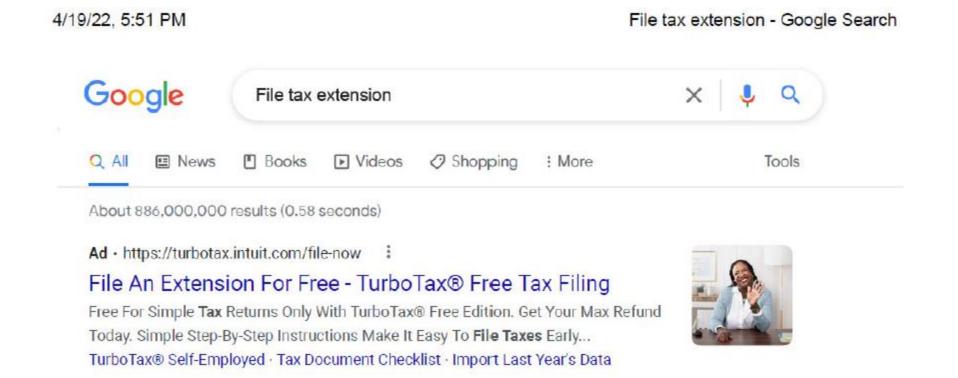
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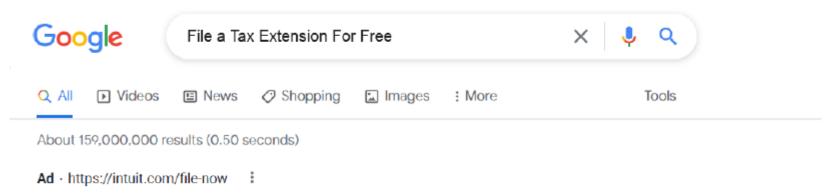
2022

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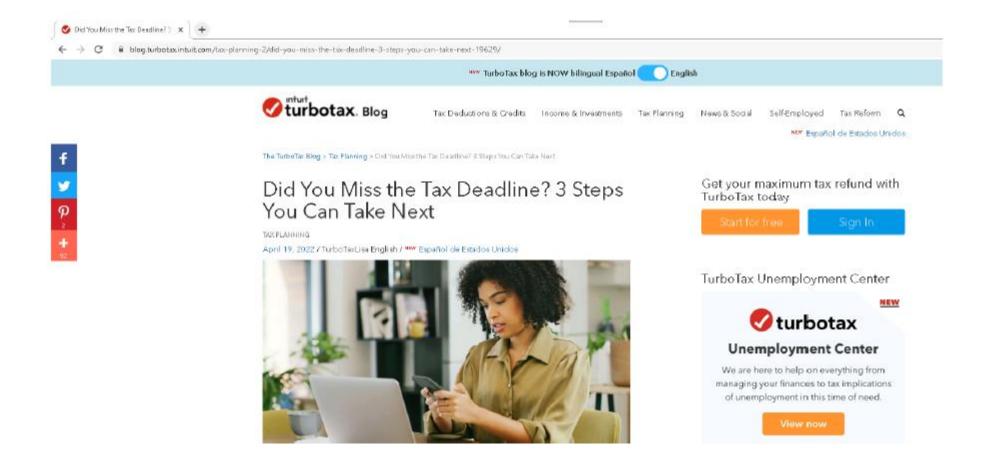
"And free and a free here and a free free free a free free free."

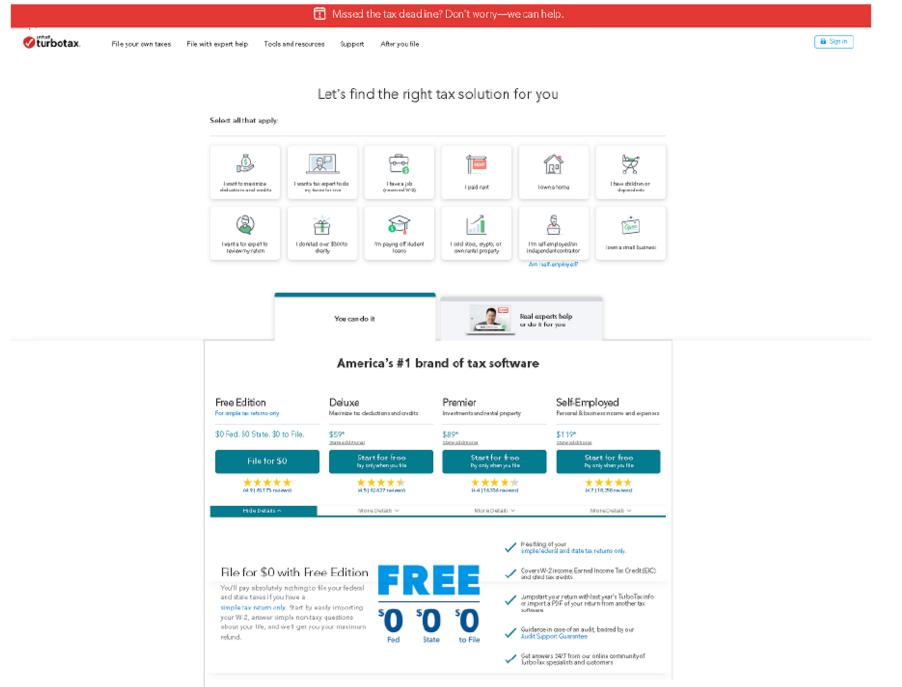




### File An Extension For Free - TurboTax® Free Tax Filing

Free For Simple Tax Returns Only With TurboTax® Free Edition. Get Your Max Refund Today. Simple Step-By-Step Instructions Make It Easy To File Taxes Early Or File An Extension. Finish and File Today. File With Confidence. Maximum Refund Guaranteed.





2022 TurboTax website capture, Shiller Dec., GX 342, ¶ 208

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