

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

INTUIT INC. and
CREDIT KARMA, INC.,

Defendants.

Case No.: 1:20-cv-03441-ABJ

**REPORT AND CERTIFICATION OF COMPLIANCE WITH TUNNEY ACT
REQUIREMENTS ON BEHALF OF DEFENDANT CREDIT KARMA, INC.**

Pursuant to Section 2(g) of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(g), Defendant Credit Karma, LLC (“Credit Karma”) respectfully submits the following “description of any and all written or oral communications by or on behalf of” Credit Karma “with any officer or employee of the United States concerning or relevant to” the Proposed Final Judgment filed in this action on November 25, 2020. Consistent with the requirements of Section 2(g), this description excludes “communications made by counsel of record alone with the Attorney General or the employees of the Department of Justice alone.”¹

1. On October 2, 2020, counsel for Credit Karma communicated by letter with James Kohm of the Federal Trade Commission to provide notice of the proposed divestiture contemplated by the Proposed Final Judgment.

2. On October 27, 2020, Julie Magee of Credit Karma participated in a teleconference with Kenneth Corbin of the Internal Revenue Service.

¹ Intuit Inc. completed its acquisition of Credit Karma, Inc. on December 3, 2020. As a result of the acquisition’s completion, Credit Karma’s name has changed from “Credit Karma, Inc.” to “Credit Karma, LLC.”

3. On October 29, 2020, Julie Magee of Credit Karma communicated by email with Diane Fox of the Internal Revenue Service.

4. On October 30, 2020, Julie Magee of Credit Karma communicated by email and participated in a teleconference with Kevin Hatton of the Internal Revenue Service.

5. On October 30, 2020, Julie Magee of Credit Karma communicated by text message with Diane Fox of the Internal Revenue Service.

6. On November 12, 2020, counsel for Credit Karma and Intuit participated in a video conference with counsel for the United States. Kenneth Lin and Susannah Wright of Credit Karma also participated in the video conference.

7. On November 25, 2020, Wayne Mercado of the Internal Revenue Service communicated by email with Julie Magee of Credit Karma.

8. On November 30, 2020, Julie Magee of Credit Karma communicated by email with Wayne Mercado of the Internal Revenue Service.

Credit Karma certifies that, with this submission, it has complied with the requirements of 15 U.S.C. § 16(g) and that this submission is a true and complete description of such communications known to Credit Karma.

Dated: December 7, 2020

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Scott A. Sher

Scott A. Sher (D.C. Bar No. 490614)

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Counsel for Defendant Credit Karma, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this date, the foregoing will be filed with the Clerk of Court using the CM/ECF system, which shall send notice to all counsel of record.

Dated: December 7, 2020

s/ Scott A. Sher

Scott A. Sher (D.C. Bar No. 490614)