UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

CREDIT KARMA, LLC, a limited liability company.

FILE NO. 202 3138

AGREEMENT CONTAINING CONSENT ORDER

The Federal Trade Commission ("Commission") has conducted an investigation of certain acts and practices of Credit Karma, L

record for 30 days and information about them publicly released. Acceptance does not constitute final approval, but it serves as the basis for further actions leading to final disposition of the matter. Thereafter, the Commission may either withdraw its acceptance of this Consent Agreement and so notify Proposed Respondent, in which event the Commission will take such action as it may consider appropriate, or issue and serve its Complaint (in such form as the circumstances may require) and decision in disposition of the proceeding, which may include an Order. *See* Section 2.34 of the Commission's Rules, 16 C.F.R. § 2.34 ("Rule 2.34").

5. If this agreement is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to Rule 2.34, the Commission may, without further notice to Proposed Respondent: (1) issue its Complaint corresponding in form and substance with the attached draft Complaint and its Decision and Order; and (2) make information about them public. Proposed Respondent agrees that service of the Order may be effected by its publication on the Commission's website (ftc.gov), at which ti-6 (e)4 (pts4(nf)3 (or)3 (m (e)4 (d TJT[t)-2 (i)-2 (-6 (e)4 (pts4(nf)d (t)-12 (hs)-1 (i)-2 (on (e)4 (pt4 (e)4))))

CREDIT KARMA, LLC

FEDERAL TRADE COMMISSION

By:

Date:

EVAN ZULLOW LISA ROTHFARB Federal Trade Commission Attorneys, Bureau of Consumer Protection

KIRKLAND & ELLIS LLP

APPROVED:

Rich Cunningham Olivia Adendorff KIRKLAND & ELLIS LLP

Sandhya P. Brown Assistant Director Division of Financial Practices

Malini Mithal Associate Director Division of Financial Practices

Samuel Levine Director Bureau of Consumer Protection

Date:

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COMMISSIONERS: LinBaM.DiF2 ()3 (\$)(6)(0)3Md(T\$.2Td(P &ICIt(Cn.aoT).00e98-1422-1.15Td(T2.122))

Findings

- 1. The Respondent is Credit Karma, LLC, a Delaware limited liability company, with its principal office or place of business at 1100 Broadway, STE 1800, Oakland, California 94607. Respondent has been the successor to Credit Karma, Inc. since December 2020.
- 2. The Commission has jurisdiction over the subject matter of this proceeding and over the Respondent, and the proceeding is in the public interest.

ORDER

Definitions

For purposes of this Order:

A. "Covered Product or Service" means any product, service, plan, or program

II. Monetary Relief

IT IS FURTHER ORDERED that:

A. Respondent must pay to the Commission \$3,000,000.

redress, Respondent must provide it, in the form prescribed by the Commission representative, within 14 days.

V. Acknowledgments of the Order

IT IS FURTHER ORDERED that Respondent obtain acknowledgments of receipt of this Order:

- A. Respondent, within 10 days after the effective date of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. Respondent must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives having managerial responsibilities for conduct related to the subject matter of this Order; and (3) any business entity resulting from any change in structure as set forth in the Provision titled Compliance Report and Notices. Delivery must occur within 10 days after the effective date of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.
- C. From each individual or entity to which Respondent delivered a copy of this Order, Respondent must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

VI. Compliance Report and Notices

IT IS FURTHER ORDERED that Respondent make timely submissions to the Commission:

- A. One year after the issuance date of this Order, Respondent must submit a compliance report, sworn under penalty of perjury, in which Respondent must: (1) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission, may use to communicate with Respondent; (2) identify all of Respondent's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (3) describe the activities of each business; (4) describe in detail whether and how Respondent is in compliance with each Provision of this Order, including a discussion of all of the changes Respondent made to comply with the Order; and (5) provide a copy of each Acknowledgment (or documents showing electronic Acknowledgment) of the Order obtained pursuant to this Order, unless previously submitted to the Commission.
- B. For 5 years after the issuance date of this Order, Respondent must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in: (1) any designated point of contact; or (2) the structure of Respondent or any entity that Respondent has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or

C. This Order if such complaint is filed after the Order has terminated pursuant to this Provision.

Provided, further, that if such complaint is dismissed or a federal court rules that Respondent did not violate any provision of the Order, and the dismissal or ruling is either not appealed or upheld on appeal, then the Order will terminate according to this Provision as though the complaint had never been filed, except that the Order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

April J. Tabor Secretary

SEAL: