

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ADAM STEELE,	)	
BRITTANY MONTROIS, and	)	
a Class of More Than	)	
700,000 Similarly Situated	)	
Individuals and Businesses,	)	
	)	
Plaintiffs	)	
v.	)	CIVIL ACTION
	)	FILE NO. 1-14-cv-01523-TSC
UNITED STATES OF AMERICA	)	
	)	
Defendant	)	

**PLAINTIFFS' MOTION**

**FOR CLASS CERTIFICATION**

Plaintiffs hereby move, pursuant to Fed. R. Civ. P. 23 and Local Civ. Rule 23.1, for class certification. The complaint seeks an injunction to cause the U.S. Treasury Department to cease charging for preparer tax identification numbers (PTINs) and PTIN renewal, restitution of funds paid to receive and renew PTINs, and an injunction to cause Treasury to only request information of tax return preparers necessary to issue a PTIN.

Plaintiffs move the Court to certify the following class:

Individuals who prepare tax returns for others for compensation and firms (including partnerships) and companies the employees or some or all of the owners of which prepare tax returns for others for compensation, and who: (a) paid the initial PTIN issuance user fee; or (b) paid the initial PTIN issuance user fee and one or more PTIN renewal user fees. However, Allen Buckley and Allen Buckley LLC are excluded from the class.

As shown in the accompanying memorandum in support of this motion, in order to certify the class, the Court must find that Plaintiffs satisfy the requirements of Rule 23(a) and the requirements of Rule 23(b)(1), (2) or (3). Plaintiffs satisfy these requirements.

A proposed order granting the motion is filed herewith. In addition, Plaintiffs support this motion with the attached memorandum, declarations of class representatives, legal authorities cited in the memorandum and all the pleadings and filings in this case.

DATED: October 2, 2014.

Respectfully submitted,

/s/Allen Buckley

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