



March 12, 2019

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Google LLC
Attn: Google Ads

Re: *John Crestani and Pendragon Labs, LLC*

To whom it may concern:

Our firm represents John Crestani and his company Pendragon Labs, LLC. It has come to our attention that Google LLC has disapproved advertisements regarding Mr. Crestani's company and his online business training courses, "Internet Jetset" and "Super Affiliate System." Google has suggested that such advertising might violate Google's "Misleading content" policy, which purports to disallow ads "[m]aking false statements about your identity or qualifications," "[u]sing false claims or claims that entice the user with an improbable result (even if this result is possible) as the likely outcome that a user can expect," "[f]alsely implying affiliation with, or endorsement by, another individual, organization, product, or service," "[a]ds that mislead or trick the user into interacting with them," and "[p]roviding a business name that is anything other than the domain, the recognized name of the advertiser, or the promoted downloadable app."

Based upon our review of the advertisements for Mr. Crestani and his company, including the "Internet Jetset" and "Super Affiliate System" training courses, we do not believe the advertising violates Google's advertising policies. The marketing and sale of the Internet Jetset and Super Affiliate System training courses is done through independent contractors called Affiliates. The advertising used by the Affiliates offers a free training webinar about starting an online business from scratch. The only requirement to qualify for the webinar is a stable internet connection, a computer, and the individual must be eighteen years or older. An example of the ads used by the Affiliates to market the free webinar is as follows:

Free Training: Webinar
Your Guide to Making Money
Get The Free Training Today
Learn how you can start your online business from scratch

Must have a stable internet connection, and desktop or laptop computer.
Must be over 18
<https://www.jamesaddington.com>

We do not believe that ads like the one above violate Google's advertising policies for the following reasons. First, the ads do not make false statements about the identity or qualifications of the Affiliate or Mr. Crestani and his company. Second, they do not utilize false claims or claims that entice the user with an improbable result (even if this result is possible) as the likely outcome that a user can expect. In fact, the ads do not mention results that may be obtained from the use of the free training webinar or the Internet Jetset and Super Affiliate system training courses. Instead, it offers the free webinar as a guide to making money through an online business.

Third, the ads used by the Affiliates do not imply affiliation with, or endorsement by, another individual, organization, product, or service. The ads claim no such affiliation or endorsement. Fourth, individuals that might encounter the ads are not misled or tricked into interacting with the Affiliate or Mr. Crestani and his company. The ads do not contain any of the examples that Google sets forth in its advertising policies that it believes might entice an individual to interact with the advertiser. They do not "resemble system or site warnings/error messages, nor do they "simulate messages, dialog boxes, menus, or request notifications." The ads "are indistinguishable from other content," they do not "depict[] features that do not work, such as close buttons, text input boxes, multiple choice options," and they do not contain "download or install buttons." Likewise, the ads do not have a "transparent background," "images that are segmented," or include "an image that contains multiple copies of itself within the ad." Finally, the ads do not contain "images that appear to be more than one ad" or utilize "moving and clicking arrows." Instead, the ads are straightforward, offering access to a free training webinar related to starting an online business from scratch.

Finally, the ads do not provide a business name that is anything other than the domain, the recognized name of the advertiser, or the promoted downloadable app. The only name that is used to advertise the free training webinar or Mr. Crestani and his company is the domain name that is provided in a link at the bottom of the ads.

Like the ads, the "destination" that the ad links to does not violate Google's advertising policies. The website that individuals accessing the ads are redirected to provides those individuals with an earnings claim statement, an income disclaimer, and details regarding Pendragon's refund policy. The site also provides other related information.

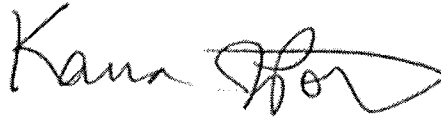
The advertising utilized by Mr. Crestani and his company and their Affiliates is comparable to that of Sam Ovens and Tony Robbins, which advertise regularly on Google. Accordingly, we do not believe that Mr. Crestani and his company should be precluded from

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advertising their free training webinar and/or other products and services on Google. We hereby request that Google allow Mr. Crestani and Pendragon Labs, LLC, as well as their Affiliates, the ability to market their products through Google Ads.

DATED this 12th day of March, 2019.

CHRISTENSEN & JENSEN, P.C.



Karra J. Porter
J.D. Lauritzen
*Attorneys for John Crestani and
Pendragon Labs, LLC*

KJP/JDL

cc: John Crestani
Pendragon Labs, LLC