



March 7, 2019

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Facebook, Inc.  
Attn: Facebook Ads Support Center

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 Facebook, Inc. has prohibited the advertising of Mr. Crestani's company and his online business training courses, "Internet Jetset" and "Super Affiliate System." Facebook has suggested that the advertising of Mr. Crestani's company and his training courses might violate Facebook's "Multilevel Marketing" policy. That policy provides that: "Ads promoting income opportunities must fully describe the associated product or business model, and must not promote business models offering quick compensation for little investment, including multilevel marketing opportunities."

Based upon our review of Mr. Crestani and Pendragon Labs, LLC, including their training courses, we believe that the Internet Jetset and Super Affiliate System training courses are not a "multilevel marketing opportunit[y]" as might implicate Facebook's policy. Multilevel marketing is "characterized by the payment by participants of money to the company in return for which they receive (1) the right to sell a product and (2) the right to receive in return for recruiting other participants into the program rewards which are unrelated to the sale of the product to ultimate users." *In re Koscot Interplanetary, Inc.*, 86 F.T.C. 1106, 1181 (1975).

Neither the Internet Jetset, nor the Super Affiliate System, training courses meet the above criteria. Consumers purchasing the Internet Jetset or Super Affiliate System training courses receive quality online training regarding business strategies, marketing methods, and other business advice that has been developed by Mr. Crestani and his company. The training courses are intended to provide quality online training to people who seek freedom of time and freedom of location.

The marketing and sale of the Internet Jetset and Super Affiliate System training courses is done through independent contractors called Affiliates. The

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advertising used by the Affiliates fully describes the product and does not contain any suggestion of quick compensation for little investment, or anything comparable thereto. In other words, the product advertised by Mr. Crestani, Pendragon Labs, LLC, and their Affiliates is comparable to that of Sam Owens and Tony Robbins, which advertise regularly on Facebook.

The Pendragon Labs, LLC compensation plan enables Affiliates to earn compensation on a commission basis as they market and sell Pendragon's products, and it does not reward or otherwise compensate Affiliates for recruiting other participants. Affiliates are compensated on a commission basis based upon their efforts to market and sell Pendragon's products. The compensation plan is managed by Clickbank, a service of Click Sales, Inc., a Delaware Corporation with headquarters in Boise, Idaho.

In sum, the advertising of Mr. Crestani's and Pendragon Labs, LLC's products do not violate Facebook's "Multilevel Marketing" rule/policy. We hereby request that Facebook allow Mr. Crestani and Pendragon Labs, LLC, as well as their Affiliates, the ability to market their products through Facebook Ads.

DATED this 7th day of March, 2019.

CHRISTENSEN & JENSEN, P.C.



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

KJP/JDL

cc: John Crestani  
Pendragon Labs, LLC