6 Shocking “Legal Gotchas”
That Can Shut Down Your Online Business

(How to Protect Your Business from the FTC...)

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Introduction

Welcome! A lot of people are going to be reviewing this material, and there’s a really good reason for that. Messing around with the Federal Trade Commission (FTC) is not a good thing. The fact of the matter is that if you’re not careful you can lose everything that you have when it comes to your online business and not even know what you’re doing wrong.

You really need to take some time and focus on this material because what’s going to be covered is how to build your business and do it in a way that is not only ethical but compliant. It’s likely that you are trying to be as ethical as possible in your business practices, but unfortunately, when it comes to an online business, trying to be ethical doesn’t always mean that you’re being compliant. Not only do you have to worry about being compliant with the FTC, but you have to be compliant with Google, with Bing, with Facebook, etc.

Look at the screenshot above. It says “Why These Tragic (Legal) ‘War Stories’ Could Get Your Bank Accounts Frozen By The FTC...And What You Can Do To Avoid Happening To You!” First of all, what does this statement mean by ‘war stories’? This term refers to lawsuits that have been the FTC against online marketers just like you. Many of them were the results of some very tragic legal mistakes, legal omissions, or lack of compliance.

In a lot of cases, these lawsuits were brought up against people that never really intended to violate the law. To use an old cliché, “They just didn’t know what they didn’t know”. That
resulted in a failure to build legal compliance strategies into their marketing strategies and plans. Most of them probably really thought that being ethical was enough. In any event, there was some serious mistakes that led into some very grave ‘war stories’. The good news is that you have a chance, right now, to learn some valuable lessons from them.

In the interest of full disclosure, you need to know that some of these ‘war stories’ are a little bit scary. However, you shouldn’t worry because in this presentation, you are going to gain access to a very simple and easy solution. Before really digging into this material, you should know that there are going to be some very important takeaways in this lesson that you need to take note of. The first is:

“Successful Marketing Strategies Reflect Built-In Legal Strategies.”

Furthermore, you need to know that this presentation is for informational purposes only. Therefore, it should not be construed as legal advice, and certainly no attorney-client relationship will be created as a result of you reviewing this material. You should also know that the creation of this material was not a result of an endorsement of the FTC.
Why You Can No Longer Ignore the “800 Pound Gorilla”

Yikes! There’s an 800 pound gorilla in the room! It’s watching you every time you write marketing copy, or a sales page, or even just a squeeze page. Hopefully, you figured out by now that the ‘gorilla’ being spoken of is really just a metaphor for the FTC. You’ve probably even heard this ‘gorilla’ metaphor a number of times before, and it is usually used in scenarios where it represents worry or concern. You know this thing is in the room, but you’d rather just ignore it. Today, you’re not going to ignore this gorilla. In fact, you’re going to focus on it.

By the end of this presentation, you’ll know a lot more about this gorilla than you do now. You’re going to know how he works, how he affects you, and how he affects how you operated your business. More importantly, you are going to learn just how easy it can be to tame this gorilla so that you can operate your business in a worry-free manner.

It’s important, of course, whenever you learn from anyone at all that you at least know who it is you’re talking to. Chip is a full-time practicing attorney, and he has been for over 30 years now. Currently, he is of counsel to the Atlanta firm, Jones & Haley. His area of practice in this law firm is in areas of Internet Law, Software as a Service (SaaS), and Intellectual Property Law (IP). He’s also served as an adjunct professor in software law at Wake Forest University. In addition to all of this, he has authored four different books in the fields of Software Law and Internet Law.
Jones & Haley is a small firm that focuses on business clients. In 2011, they were named one of Atlanta’s top law firms, which is something that Chip is very proud of, as he should be. The plaque that they received for this is shown above. Now that you know a little about who Chip is, here’s a list of what will be covered in this presentation:

1. Why the FTC is now going after the little guys, and why you should be worried!

2. What it’s like to get sued by the FTC and how your bank accounts and personal assets can be frozen and lost forever!

3. Real-life examples of people who didn’t think they were at risk but who got nailed by the FTC, and why it could happen to you too!

As previously mentioned, Chip has more takeaways that he wants you to take note of. He wouldn’t have singled these out if they weren’t critical for you to know, so please review them closely. They are:

- “If you sell to consumers (including work-at-home) located in the US, you’re personally liable for deceptive marketing practices, regardless of where you’re located worldwide.”

- You risk losing it all, including family assets and bank accounts.

- Cleverly worded disclaimers won’t protect you; Rules of the Road will.

- Asset protection schemes are utterly useless against FTC claims.

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If you sell to consumers, and people who work at home are still considered to be consumers, located anywhere in the United States, you’re personally liable for deceptive marketing practices. This is true for you no matter where you are located in the world. You can be in Europe, for example, and selling into the US to consumers, and you will be held liable if your marketing practices are found to be deceptive. The remaining takeaways listed above really just kind of support this same idea.

When you are personally liable, you risk losing personal assets. This includes your family assets and your personal bank accounts. You also need to know that cleverly worded disclaimers won’t protect you. A lot of people feel like they will, but that’s not the reality. You need to know the rules of the road about how to operate your business. Furthermore, you need to know that asset protection schemes are utterly useless against FTC claims. Even if you operate as an LLC or any of the rest of these entities, the FTC can penetrate those like a hot knife through butter. They won’t protect you. Here are several other facts that you should know:

- Your ideas about “due process of law” are all wrong regarding FTC claims.
- You know that you’re not legal in a number of areas, but ignorance is no excuse
- The only defense is to learn how to operate online business legally and to simply do it!
- “‘Set it and forget it’ is an open invitation to a massive FTC claim!”

The last of the points listed is probably the most important one in this set. It says “‘Set it and forget it’ is an open invitation to a massive FTC claim!” What that means is that simply putting
up a privacy policy and a few disclaimers and then forgetting about it is something that’s almost
guaranteed to get you into some serious trouble. There’s more to it than that though, and that
will be further explained later on in this lesson.

It’s important that you understand that the FTC plays a central role in the operation of any
online business. That’s where your focus should be when it comes to compliance. However,
you also need to know about intellectual property protection, limitation of liability, and so
much more. In other words, there are other aspects to operating your business legally that
don’t strictly pertain to the FTC. You’ll be given some insight into these as well as some
resources that will help you to stay compliant.
Contrary to popular belief, the FTC does go after the little guys, not just big corporations. There are really three different phases of how this developed and evolved over time. The first, Chip refers to as the “Wild Wild West”. This was when the Internet first began and became a commercial reality back in the mid-nineties. This period ended around 2008. Back then, there was very little regulation and only a small amount of activity. The world was still waiting to see how this new entrepreneurial network would play out. So, there wasn’t a lot of interference, but as a result, there was a lot of scamming going on all over the Internet back then.

One thing that’s good about all of this is that this period of time is over and things will never be the same again. It was in 2009 that the FTC “Tsunami” began. This was when a ton of new laws and regulations began coming into play. This is because the FTC was really starting to step up their enforcement, but when this was occurring, the prime targets were really just the “Big Guys” such as Google, Facebook, and Twitter. The little guys were fairly safe.

The next ‘enforcement phase’ really began in 2014. Chip refers to this phase as the “FTC Drill Down”. Since then, the FTC has started to focus on the smaller, “little guys”. Some of the things that the FTC is looking at are:

- Unsubstantiated claims
• Testimonial disclosures failures
• Membership – ROSCA statute
• Work-At-Home – Biz Op Rule
• Affiliate marketers
• Coaching programs
• Privacy Policy Statements

A lot of this is covered in much more detail in Chip’s book. So, make sure and take advantage of his free offer today. Now that you know what the FTC is looking the closest at, you are probably wondering what it would be like to be sued by the FTC. Even if you are one of these “little guys”, you need to understand that you really can’t hide. Now larger players are still more likely to be found, particularly if they have generated some complaints with their funnels and so on.

You have to understand that when something like this comes to the FTC’s attention, they begin looking at the overall category of a marketer that is exhibiting this behavior, and you may fall into that group. So, even if you’re not a larger player, if you are categorized along with someone breaking the rules, you’re going to be checked into as well. It doesn’t matter if you are in the back row or not. In other words, you might be part of the group that’s targeted because of something the guy on the front row is doing. You need to understand that you cannot hide from the FTC.

In order to build a case, one thing that the FTC does is simply go online and look at your website. In the fall of 2014, the FTC sent out 60 or so letters to online marketers that said something like “We’ve looked at your website, and we think we see a number of violations. We don’t see how in the world you can substantiate some of your ad claims, and we strongly recommend that you correct these things.” The FTC can see you 24/7 and certainly keep an eye on what you are doing.
The way that the FTC really gets down into the nitty-gritty is through marketing funnels. They use some of the same tactics that online marketers use. Their prime funnel, according to Chip, is the complaint form on the FTC’s website. This form is shown above. If you Google ‘FTC complaint’, it will come up as the #1 hit. By the way, this form is a lot more comprehensive than the screenshot above might indicate. In fact, it’s very comprehensive. They are asking for lots of information.

Basically, this form asks your customers, and those familiar with your website, to complain in great detail. This is one of the ways that they derive and collect information that they can use to build a case against you or some other online marketer. You may or may not be aware of this, but they also have a Facebook page. This page has a ‘Review’ section. Now a lot of these reviews consist of just gripes that people have, but they do check these things out. If there’s a complaint that looks significant, they will follow it. So, this is the second type of funnel that they use to collect information against marketers that are taking advantage of consumers. That’s what the FTC does.

The biggest sources of information that the FTC has are affiliate networks. Online marketers aren’t the only group of people that use affiliate networks. They rely on news articles, blog posts and tweets, and Better Business Bureau (BBB) referrals. A lot of complaints come through the BBB. Some people haven’t heard of the FTC’s complaint form before, but just about everyone has heard of the BBB. In many cases, the complaints there are funneled to the FTC.
There is a division of the BBB that’s called the National Advertising Division. It operates under the acronym NAD. They actually review websites and online marketers who may be involved in deceptive practices. A lot of those reviews are sent to the main division of the BBB. Aside from that, there are advocacy groups and even competitors can file complaints. On top of this, there are 28 states that have little FTC groups set up through the State Attorney General offices. Now, every state has consumer protection laws, but 28 of those states have statutes that are modeled closely after the FTC’s.

A lot of people don’t know that the Attorney General in New York sued Donald Trump University for the sale of coaching programs a couple of years ago. So, they can also bring separate actions that are very similar to what the FTC might bring. They also refer complaints. So, there’s a vast network of entities that feed complaints to the FTC. When they start getting complaints, which are their stock and trade by the way, that’s their traffic, right? What do they do with it? In most cases, they will send an informal letter inquiring about how your ad claims are substantiated and things like that.

If the FTC doesn’t like your answer, or feel as though you aren’t being cooperative, you’ll receive a ‘Civil Investigative Demand’, or a CID. This is essentially a subpoena. Above you’ll find a clip from the third phase of a CID process. The first step is to file the inquiry, and they request tons of information about your market. Then, if you’re the recipient, you would return with a petition to ‘quash’. That’s a legal term that pretty much means that you are on a fishing investigation and you’re asking for too much, or that the information is too broad.
FTC will normally deny your petition to ‘quash’. After that, the lawsuit gets filed because information has been collected and analyzed, so the decision has been made to file a lawsuit. You can see what the top half of this complaint looks like by looking at the screenshot above. This was brought up against a small LLC company which was selling money-making opportunities and upsells to coaching programs. What Chip points out is that in the right-hand column, you’ll find something that will make the hair stand up on the back of your neck. That is that this document calls for an “Asset Freeze”.

Below you’ll find yet another clip that has been taken from a different case. This one is from a company called Online Entrepreneur. This is another so called “little guy” that was selling money-making opportunities that included websites with upsells. They were nailed for almost $3 million. One of the interesting things about this case was that this company was so little that they couldn’t even come up with the $2.9 million this case was calling for.

You know, companies like Microsoft or Google can just write a check for $20 million, and it’s just pocket change for them. However, if you’re a “little guy” in the online marketing world, and you have a $2.9 million judgment against you, then what do you do? What the FTC did was they made the individual officers and owners of this company sign affidavits under oath that they had identified all their personal assets, and then they said “If you surrender these assets, including the personal bank accounts that are specified, the real estate you have, your personal computer, etc., we will suspend the remainder of the judgment.” In this case a wife’s diamond necklace was involved as well.

Under this agreement, their assets were liquidated and then the rest of the remaining amount

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was excused. However, if they ever find out that they were lying about and hiding assets, the remainder of the judgment would then come into play. Anyway, that’s what happened to these unfortunate guys. If you look at the middle of the screenshot above, over on the right-hand side, you’ll see that this document specifies that any asset that they had should be included. That would include bank accounts, property, etc. This prohibits any type of concealing, dispersing, dissipating, etc of assets. Chip just wanted you to see an example of what an asset freeze looks like, and he says that he hopes you never see one.

In the same case, a receiver was appointed. A ‘receiver’ is a completely independent party, appointed by the court, which goes in and takes over your business. So, you’re shown the door and the receiver takes full control of your business and all of its assets. Then, they report back to the court. If that doesn’t get your attention, nothing will. That’s what happened in the Online Entrepreneur case.

Once all of this has happened, the FTC typically provides what’s called a ‘Settlement Demand’. This way the case could be concluded based on an agreement. However, this ‘Settlement Demand’ is non-negotiable. It’s a ‘take it or leave it’ type of thing. In another case, involving a company called Commerce Planet, Inc., there were a number of individuals who were working in the company. One of them was a guy named Aaron Gravitz, and he settled for a little less than $200,000. However, another guy in the company, named Charles Gugliuzza, refused to settle.

Charles was a lawyer, and he thought he could do battle with the FTC. This ended up being a terrible idea. He fought and lost, and he ended up with a judgment of $18.2 million. That’s close to about 10 times what Gravitz settled for. One of the lessons here is not to litigate with
the US government. They’ve got unlimited resources, and there’s no way that you’re going to win. On top of the $18.2 million, he was required to do 20 years of compliance reporting. This judgment was confirmed after it was appealed by the 9th Circuit. This was back in 2012.

You’re almost always going to be ahead of the game if you take the non-negotiable settlement offer. As a result of agreeing to this offer, you’ll be served the ‘Final Order’. This is almost always segmented into three parts, as indicated in the screenshot above. There’s always a ‘Permanent Ban’, or an injunction, against what you were doing. In other words, whatever the complaint was for the lawsuit, you are going to be banned from.

The second part of the order will pertain to the payment of money. The technical term for this is ‘Equitable Restitution’. You would think of it as a fine, except in this case it would involve huge numbers. The FTC has a massive amount of power, and they can absolutely go after your family assets. By the way, when you get a judgment like this against you, it’s not dischargeable by bankruptcy. So, you can’t just run out, file for personal bankruptcy, and done with it. That’s because a charge like this is considered fraud, which is non-dischargeable. You’ll have to live with this judgment from here on out.

The last piece of a typical order like this is ‘Sworn Compliance Reporting’. The period that you have to do this is usually for 10-20 years. What the FTC wants to do is stay very close to you. They’ll want to know all of your contact information, and they will want that continually updated. Then, they will also want to know about all of your business activities, where you are working, what you’re doing, and so on. You’ll have to keep all sorts of records pertaining to all of this, particularly if you are involved in any type of online marketing after the case is finalized.

The final order is not only just a big number that you’re stuck with in terms of financial liability. **CLICK HERE Now to Access “FTC Guardian” (and Grab Jay’s $475 Bonus Package)**

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Also, you’ll have a permanent injunction on you, so you’re not going to be able to work in some of the areas that you’re more familiar with, and you’ll have 10-20 years of compliance reporting, which is just a terrible nightmare when it comes to what you have to keep records of.

Here’s one of the more detailed cases. Well, there’s actually two. The first one is about a company called Acquinity Interactive. They were involved in free offers. If you’re an internet marketer, it’s likely that you make free offers as well. Most of the time internet marketers will make free offers on their squeeze pages to get people to join their lists. This might be something as simple as a free eBook or report.

The Acquinity Interactive case is a free offer case that also involves robo calls. This was particularly involving a man named Gary Jonas who lives in Florida. The defendant’s marketing strategy was fairly straightforward. They offered “free” products. However, in order to get these products, you would have to provide a massive amount of personal information. This included phone numbers, which this company then used to send out robo calls in the attempt to sell a whole bunch of stuff to the individuals who signed up.

Among other things, the FTC alleged that these “free” offers weren’t really free, and therefore, they were deceptive and actionable under the Federal Trade Commission Act (FTCA). Some examples of the offers that were made included “Free MSG:...Test a new iPad” and “Free $1,000 Walmart Gift Card”. The kind of information required included phone numbers and credit card information as well as data pertaining to one’s income level, home ownership, etc. A lot of people never received anything for free even after providing all of this information, and some of them were even required to spend money even though the offer said that they could get something for free.

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There was a settlement made in this case. Acquinity Interactive was permanently banned from illegal telemarketing, making deceptive free offers, etc. Jointly and personally they had to pay a total of $7,800,000. In this case, the defendants had a source of income that would satisfy the judgment if the FTC would allow them to make the payments in installments. The FTC agreed to this, but not without demanding the condo in Boca Raton, Florida, that belonged to Gary Jonas and his wife.

The second case that will be covered in great detail is a case involving Snapchat. This is a privacy policy case. It’s likely that everyone reviewing this material has a privacy policy because just about everyone online collects personal information. When you do, you’re required to have a privacy policy. Well, Snapchat had an interesting marketing strategy. They had a mobile app that allowed people to take pictures and videos that they called “Snaps”. The person that took the snap cool email it and text it to friends. The sender could also determine the time frame during which the recipient could view the snap. After that, the snap would “disappear forever”.

The idea was, if you were out with your friends at a bar or a party, and maybe you had one or two too many, you could take a picture with a few other people, and then you could send the picture on to two or three other friends. You knew that the picture would disappear forever, and therefore, your employer wouldn’t be able to see it. This was a pretty cool idea, except that the “disappear forever” claim was false. A picture or video would disappear sometimes, and other times it would not.
When Snapchat made this claim, and it proved to be untrue, it became actionable to the FTC. Also, this company collected location-based information. It’s required that you disclose this in your privacy policy. They also collected other categories of personal information that were not detailed in their privacy policy. All of this is considered deceptive by the FTC. Furthermore, they failed to provide reasonable security measures to protect all of the information they had gathered. So, the FTC brought forth a lawsuit making these allegations along with a few others.

Oddly enough, there was no fine levied in this case, but the defendants were permanently banned from engaging in these practices which were regarded as deceptive, they were ordered to undertake an extremely comprehensive privacy program, and they were burdened with 20 years of compliance reporting. This is another case that’s pretty well duplicable to just about all of us as online marketers. The takeaways for this portion of the lesson are as follows:

1. Honor your privacy promises
   - Do what you say you’re going to do
   - Don’t do what you say you won’t

2. Legally required disclosures
   - Categories of info collected
   - Remarketing, Internet-based ads

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You need to remember that the FTC regards the statements and assurances that you give in your privacy policy almost as though they were enforceable contractual promises. So, the rule to remember is to always do what you say you’ll do, and don’t do what you say you won’t. For example, if you say that a snap will disappear forever, they better disappear. If they don’t, it will be considered deceptive because you haven’t honored your privacy policy.

There are categories of information that need to be collected, but this is where you are going to see more regulations and lawsuits appearing. Nowadays, remarketing and interest-based ads are starting to be used more and more. This is where the browsing history of prospects is tracked over different websites so that when they go to one of these sites an ad will appear that’s based on their particular interests. This works extremely well for marketers, but the whole idea behind remarketing and interest-based ads is very controversial. In fact, it has essentially been outlawed in Europe, but in the US the FTC is very reluctant to do that because a number of consumers really actually like that ads are being targeted specifically to them.

A lot of people aren’t worried about these interest-based ads and that they are being remarked to, but there are also many people out there that are freaking out over this. The FTC’s major role is to protect consumers, but there is a division in the US between people who either like or don’t mind it and those who are disturbed by it. So as of yet, the way that they
regulate this is to have marketers provide disclosures concerning this type of marketing if it is being used.

Your privacy policy needs to include a number of different disclosures. You need to know that you can not only get in trouble if you fail to make these required disclosures, but you can also be banned from networks that sponsored these platforms, such as Google and Facebook. More information about how to get the right disclosures for your site, and how this all works, can be found in Chips book which you will be receiving for free.

Since remarketing is so effective in increasing conversions, it’s not something that’s likely to go away. However, you need to understand the importance of disclosing the fact that you are doing this. Also, you need to be careful that you follow all of the regulations concerning the information that you gather.
“FTC Gotcha” #1 - Outsourcing

The first ‘gotcha’ is the fact that you don’t own your website and other stuff that you outsource. For example, you may not really own the rights to an eBook that you outsourced even though you paid for the work. This cuts right to the heart of your online business because there is nothing more important than the ownership of your intellectual property.

This ‘gotcha’ involves outsourcing, which means hiring an independent contractor that is not an employee of yours to develop valuable intellectual property for your business such as your website, your sales page, and your software. You may even pay someone to write special reports or even your eBooks for you. These are all examples of what intellectual property attorneys call ‘copyrightable authorship’.

Most people assume that if you pay a contractor to create something for you that you would own it when they are done. That conclusion is wrong in most cases. It all comes down to the ‘Work For Hire’ rules of the U.S. Copyright Act. Now, boiled down to its essence, the Copyright Act basically says that you’ll own the copyrights in this copyrightable ownership that’s created by you independent contractor only if all three of the following elements are satisfied:

1. **There’s a written instrument.** This would typically involve some kind of written agreement between you and your outsourcer.

2. **There’s an outsourcer’s signature.** The agreement has to be signed by the contractor.

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3. **The magic phrase is stated.** The agreement must state that the work product is a “work for hire” or a “work made for hire”.

Now think about it. If your contractor owns your stuff then he or she can control it. After all, that’s essentially what ownership means. If the contractor controls your stuff, then they could license it to anyone such as a competitor of yours. How horrible would it be to pay for the creation of a website or some other type of copyrightable ownership such as an eBook only to find out that your outsourcer actually owns it and has licensed it to a competitor?
“FTC Gotcha” #2 - Copyrights

The second ‘gotcha’ is that your blog blunders create a huge liability for copyright infringement. This means that you really could be considered a copyright infringer if an infringing blog post is made by someone else, even if you didn’t know about it! Technically, you are innocent because you really didn’t know about it and you didn’t really do it, but you could still be liable for a large cost.

Let’s say that you have a blog or a forum on your website and you allow visitors to post comments. Now, unbeknownst to you, someone has stolen an article from another website and posted it on yours. This, of course, amounts to copyright infringement. You could literally be nailed for statutory damages up to $150,000 per work. At this point you might be asking “How in the world could this be?” It’s because copyright infringement is what attorneys call a ‘strict liability offense’. So, just imagine the pickle that you would be in if there were multiple infringing works posted on your blog or forum.

This could really be a serious problem for you if you have a blog or forum, but you shouldn’t give up. Blogs and forums are really great marketing tools. They are great for generating targeted traffic and building a relationship with your audience. So, what do you do? Well, luckily the U.S. Congress passed the Digital Millennium Copyright Act (DMCA) back in 1998 to remedy this problem. The DMCA provided, along with a lot of other things, a so-called safe harbor from copyright infringement liability, but there are two things that you have to do for its protection:

1. Provide a special DMCA notice in your Terms of Use.
2. File a special registration form with the Copyright Office.

As you can tell, this is an extremely simple solution to what could potentially be a big problem. The only problem is that you have to know about these things before you can do anything about them. Do you see how knowledge of these issues is really critical to the success of your business?

The third top ‘gotcha’ is a pretty serious one as well. Your membership site can easily land you on the FTC’s top target list. Please take note that there are overlapping FTC and little-known state regulations that actually make continuity programs the most regulated on the web, and the penalties for these violations are really massive. In order to truly understand these rules, we need to define what a continuity plan really is.
Essentially, continuity plans offer automatically renewed or continuous subscriptions. They are often referred to by attorneys as ‘negative option plans’. The key feature of a continuity plan is that the charges or fees are automatically renewed, usually on a monthly basis, until the subscriber cancels out of the plan. So, in a nutshell, the typical online businesses that use continuity plan are membership sites, but this would apply for any site that provides content on a subscription basis.

It’s easy to understand why continuity plans are so attractive to internet marketers. They provide a continuous income stream. You can also probably see why there’s a huge potential for abuse. Unscrupulous marketers, for example, could lure consumers into one of these plans by deceptive practices and then make it extremely difficult, if not impossible, to opt out of it. Their credit card would continuously be hit every month with a fee.
In 2010, President Obama signed the Restore Online Shoppers Act (ROSCA). This established statutory rules for continuity programs. These are really fairly simple, easy-to-understand rules. First, there has to be a disclosure of all the material terms of the continuity plan, and this disclosure must be provided before you collect a customer’s billing information. You also need to get informed consent, and that’s typically done by having your customers click an ‘I Agree’ button. This consent must be gained prior to charging their credit card.

On top of all of this, you need to provide a simple and readily available mechanism for canceling the service. That way, a customer can easily opt-out whenever he or she wants to. Also, you should know that there are additional rules when you link a free offer and bring people into a continuity program. These were added by the FTC. There’s more material in Chip’s book about this.

Also in 2010, the state of California passed the SB 340 Amendment to their False Advertising Act. Some of these rules also regulate continuity plans just like ROSCA does. Some overlap with ROSCA and some do not. The big take-away here is that if you are selling continuity plans on a membership site or some sort of subscription site, you really need to comply with both. This is critically important, and there’s more material in the book about it. For now, here are a few of the major rules:
• You must provide a clear and conspicuous display of written terms (not a link) in visual proximity to the request for consent.

• You must provide an acknowledgement of renewal terms, cancellation policy, and how to cancel

• You must provide a clear and conspicuous notice of material changes and how to cancel

The violations for these statutes are huge. The FTC can nail you for up to $16,000 per ROSCA violation, and the California attorney general can nail you for up to $2,500 per violation. Now, let’s move on to ‘Gotcha’ #4.
“FTC Gotcha” #4 – Privacy Information

Your ignorance of privacy information can cause massive FTC fines. If you don’t know what information is private and what to do about it, then you can really be facing a lot of trouble. Furthermore, social media and mobile apps really complicate matters and therefore are huge traps for the unwary.

Here’s the problem. In very simple terms, privacy information is information that is protected by privacy laws and regulations, such as your customers’ names, addresses, and billing information. There are some very fundamental requirements that you have to adhere to if you collect this type of info. One is that you have to have a privacy policy, and your privacy policy should describe the categories of information that you collect as well as how you use this information, how you share the information, and how you make it accessible to others.

Now, at this point you might be wondering exactly what information is protected by laws and regulations. Well that’s not an easy question to answer because you are really looking at a moving target. In 2004 California enacted the Online Privacy Protection Act (OPPA), and back then people were only focusing on information that could be used to identify a person. The categories of what is considered privacy information are not changing. They are beginning to include additional categories, and if you are unaware of these new categories, you could be in serious trouble.

Here’s an example of one of these ‘moving targets’. In 2011 the FTC announced, through a settlement with Google, three new categories of protected information. They were:

- Physical location data
- Screen names
- Lists of contacts

Another example lies in the context of mobile apps, which are exploding in popularity and have been for several years now. Both the state of California and the FTC have been making efforts to regulate this booming market. Just last year the California Attorney General announced that its OPPA statute would also apply to mobile apps, meaning that a mobile app needs a privacy policy. Later, the FTC jumps on the bandwagon and they announce that with mobile apps you have to get an express affirmative consent before collecting sensitive data. In this case, there are three elements of sensitive data listed. They are:
- Location data
- Medical
- Financial data

Think about this for a minute. You have to get express affirmative consent. This is a totally new requirement regarding a privacy policy. If you think about the typical website that you visit, you know that the privacy policy would typically be found through a link at the bottom of the homepage, and in many cases, at the bottom of each interior page of the website as well. However, there’s never any requirement that anyone has to click through and agree with it in order to have access to a site.

Visitors to the site can click on a privacy policy to review it any time they like, but no one is required to. Now the FTC is saying that you have to get express affirmative consent for mobile apps, which means that some sort of ‘I Agree’ button has to be clicked if you’re collecting this sensitive data. This is just another example of the moving target that you’re up against.
The fifth ‘gotcha’ is that your own privacy policy is enforced against you by the FTC. In very simple terms, this means that you either don’t do what you say you’ll do or you do what you say you won’t do in your privacy policy. Let’s say, for example, that you have a pretty standard privacy policy that sort of applies to everybody. You should know that one size doesn’t ever fit all, but for the most part you believe that it does. You haven’t read it for a while though, and you are no longer aware that you make promises in your privacy policy. Furthermore, your marketing practices have changed a bit, so your privacy policy is somewhat out-of-date.

Your privacy statement is out-of-date and you haven’t changed it to reflect upon what you do with personal data. So, what you do in terms of your marketing practices is no longer consistent with what your privacy policy says that you will do and what you won’t do. This makes you a prime target for an FTC deceptive practices claim because you are not honoring your promises.

People have a tendency to think that they are okay because they don’t make any promises in their privacy policy. That is wrong according to the FTC. You do make statements in your privacy policy and you give assurances. The FTC considers these statements and assurances legally-enforceable promises, meaning that if you don’t honor them and keep them you will be liable for a deceptive practice claim. Therefore, your own privacy policy is enforced against you by the FTC because you haven’t lived up to your promises.
This is really a pretty complex issue, but there are two simple rules that you can follow to stay on track. The first is to do what you say in your privacy policy, and the second is not to do what you say you won’t do in your privacy policy. Here’s an example. A few years ago there was a case brought up by the FTC against a company called Chitka. Chitka’s privacy policy stated that you could delete flash cookies, which was true. However, what was not disclosed was that the cookies re-constituted after 5-10 days. The FTC said that this promise was deceptive because the statement seemed to suggest that you could delete the cookies and they would stay deleted. So, this ended up being the basis of a lawsuit.

There was also a case involving Google. At the time, in their privacy policy Google promised that they would use the personal information that they collected only for the purpose that it was collected. In contrast to what was stated in their policy, Google took the personal information for the Gmail account service and transferred those names to a new service regarding social media called Buzz. So, the FTC sued them for violating their promise. This case resulted in a very large settlement.

Think about your typical squeeze page. You’ll usually find a statement on a squeeze page that says “We’ll never sell or transfer your personal information.” Think about this for a second. Never means never under any circumstances.

What if someone makes an offer that you can’t refuse to purchase your website or your online business? You would end up transferring or selling this personal information, and perhaps if you’re engaged in affiliate marketing you’d be transferring names and information in connection to the affiliate marketing. So, when you make any type of statement saying that you’ll never do something, then you’re setting yourself up to violate your own promise. A better approach would be to qualify that promise to say something like “We’ll never sell or transfer your personal information for marketing purposes.”

A lot of people shoot themselves in the foot by using statements that are too broad. Chip says that he reviewed a privacy policy for a client a few months ago, and in that policy the client had stated “We use the highest level of security for your data.” This client made a promise that he couldn’t have possibly kept because, after all, he wasn’t using military grade security to protect people’s personal information. You should never promise that you can provide the highest level of anything.

Chip also saw the words “security guaranteed” on a graphic within a sign-up page. This is another example of a promise you should make. You cannot guarantee security. No one can. We know, for example, that the Chinese live in the Pentagon’s network. You should really do nothing more than what the FTC actually requires, which is that you provided reasonable and adequate security. Remember, your statements and assurances are legally-enforceable.
promises; so be careful not to over-promise, or make overbroad or categorical statements like the ones that have just been discussed.
“FTC Gotcha” #6 – Earnings Disclaimers

The sixth ‘gotcha’ is an important one to take heed of as well. Many people naively rely solely on boilerplate disclaimers to protect themselves and/or their business. As a result of this, they fail to cover their bases with special disclaimers. If you are a book publisher, this is something that you should pay particularly close attention to.

Don't rely solely on general boilerplate disclaimers. The general approach to a lot of internet marketing sites back in the ‘Wild, Wild West’ days was to make ridiculous earnings claims and then at the same time provide some sort of disclaimer that was supposed to ‘take it all away’. Chip refers to this sort of behavior as ‘Disclaimer Panacea’. You can say anything you want, and you can even promise the moon, as long as you disclaim it, right? Things did kind of work this way for a while, but those days are gone.

A lot of the problems people have with disclaimers branches from them not knowing the difference between general and special disclaimers. General disclaimers are essential. You can find them just about anywhere, but particularly in the ‘terms of use’ section of people’s websites and so on. They typically track language out of a statute that every state has passed called the Uniform Commercial Code. It’s typically in all capital letters, and it starts off saying something like “WE HEREBY DISCLAIM ALL WARRANTIES BOTH EXPRESSED AND IMPLIED…”
You have surely seen disclaimers like this before. Generally-speaking, they are very effective if they comply with the Uniform Commercial Code, but that’s not all that’s required in many cases. A lot of times there are special situations that require disclaimers that are tailored for certain risks. Some examples are listed below. Most of them are pretty obvious, but there are probably several that you would need to use in your own business.

- Food Supplements – Not FDA Approved
- Exercise Program – Dr. Approval
- Anything Related to Health or Safety
- Anything Related to Evaluations
- Investments
- Subjective Subject Matter
- Website Legal Compliance – for Website Development

You really need to use these special disclaimers in addition to the general ones. You also need to think through specifically what you’re offering. In other words, when it comes to publishing especially, you need to take care to look at specifically what your material is covering or promising. After that, think about the risks that are related to the use of your product or service.

There are various sources for disclaimers. Later on in this training, one will be pointed out. Remember that disclaimers are necessary even though they may seem obvious. Just because something is obvious to you doesn’t mean it is obvious to a consumer. For instance, it is stated on a box of rat poison that you shouldn’t eat it. That should be completely obvious, but sadly things like this aren’t obvious to every consumer. So, always use special disclaimers to explain any risks that are involved.

The best known and the most used special disclaimer on the Internet is called the Earnings Disclaimer. These are very valuable tools provided they are used correctly. Earnings disclaimers are usually very complex and pretty long. Most of the time they are very repetitive as well, but if you boil them down they usually contain four basic things. They are:

- No promise you will make money
- No promise you will not lose money
- Internet businesses are risky
- Seek professional advice

Of course, these basic elements will be stretched over four or five paragraphs in the disclosure. Earnings disclaimers are very valuable tools for internet marketers that sell information related to making money. So, you need to use them if you are in that type of business. However, there are some potential pitfalls that you need to know about before you do so.

An earnings claim is defined by the FTC as an oral, written, or visual representation that states a specific level of potential sales, income, gross or net profit or facts that suggest a specific level of return. This would include statements like “You can earn a 6-figure income in 6 months.” A photograph of a smiling seller standing by a brand new Mercedes could also be considered an earnings claim because it implies that you can achieve the same thing by purchasing a certain product or learning about a certain system. Screenshots of someone’s PayPal account could be considered an earnings claim as well.

Now that you understand what an earnings claim is, let’s talk a little more about the pitfalls involved with earnings disclaimers. The FTC has a new set of rules related to biz ops (business opportunities). These rules went into effect in March of last year.

Chip’s book explains a little more about biz ops. The most important thing for you to know about them is that you probably never want to offer something and call it a biz op because it will be regulated as one. If you do, however, you never want to make any earnings claims with your offer as a biz op. The rules regarding disclosure and notice are so complicated and detailed that it’s almost impossible to be confident that you have complied with them. So, never offer a biz op and make an earnings claim.

The second pitfall is that even if you do avoid biz op regulations, there’s still a gray area that you have to be wary of. Say that you make an earnings claim but you have no substantiation of it, and then you have an earnings disclaimer. There’s a contradiction occurring within this scenario. First you have an earnings claim that you can’t prove and then you disclaim the claim that you made. This apparent contradiction could be viewed by the FTC as deceptive. At this time there’s no known case by the FTC brought on this basis, but it’s something that they are going to be taking a very hard look at in the near future. So, be careful with earnings claims used on this basis.

The rules regarding ‘success story’ testimonials have recently changed as well. These are similar to earnings claims, except they are not made by you but by purchasers of your products. Back in the ‘wild, wild west’ days, you probably saw a lot of ridiculously positive success story...
testimonials, and then beneath one of these testimonials, you likely saw a disclaimer that said something like “Results Not Typical” and “Your Results May Vary”. Back then, disclaimers like them were enough.

Marketers would promise you the moon and then place one of these disclaimers on the page, and that was okay. Now you have to have proof that a success story that shows what a consumer would generally achieve. For instance, you can’t show some guy that lost 30 pounds in 30 days. He might have, but in general people are not going to achieve this result. Also, if you have no proof on what the person leaving the testimonial has actually achieved, then be sure and disclose only generally expected result.
CLICK HERE Now to Access “FTC Guardian” (and Grab Jay’s $475 Bonus Package)
(NOTICE: This Special Offer Disappears Sunday, July 23rd @ midnight PST)
Introducing FTC Guardian

Quite a bit has been covered throughout this lesson, and the truth is that it only scratches the surface. The big question is, “Do you stay up at night worrying about compliance?” You know, it’s not good to worry, and no one is suggesting that you should. What you really need to do is take control. You can do so by adopting a legal strategies solution.

One option that you have is to employ an attorney. This way, you’ll get the best advice from someone that actually specializes in this area of law. You’ll want someone who has a lot of clients and experience to be sure that they thoroughly understand the rules. A person like that would give you excellent service. Clearly, that would be the best option.

The problem that people often run into is that they don’t have the budget to hire an attorney such as this. On the other hand, if you aren’t advised by an expert, the consequences of not following the rules correctly could be extremely costly. Another option that you have is to join FTC Guardian with a pro-level membership. This is exactly why Chip and Allyn created this program. They wanted to make a difference in people’s lives!

When Chip and Allyn first began creating their program, they jotted down exactly what they thought it would take to create a meaningful solution that could make a real difference. One of the details that they wrote down is that whatever program they came up with would have to be simple and easy to utilize. They also knew that any documents created for the program had to be customizable so that they could fit each business scenario individually.

Chip and Allyn also decided that their program should include training for legal strategies. After all, they knew that documents alone would not protect their clients. Third, the program had to include updates so that everyone in the program stayed current. In a way, this makes their program better than hiring an attorney because, while a professional would keep you up to...
speed, what would happen if you didn’t meet with them often enough? Changes to the legal system occur all of the time, so if you didn’t meet with your attorney for a few months, you could be missing information and not know you’re at risk.

In addition to all of this, Chip and Allyn knew that their members would need an efficient way to locate information. Remember, you have to know what you don’t know. When you have an effective way to look up information, you can make sure that you know what you need to know and find any answers that you need when you just don’t know. FTC Guardian includes a tool that can help you do this.

Obviously, these men knew that any tool they created would have to complement marketing. This isn’t as cut and dry as saying, “Here are the rules. Now go follow them.” You need to understand how these work so that you can develop marketing strategies without raising your level of risk.

Finally, the program would have to be affordable. It wouldn’t do anyone any good if they had to pay as much or more than they would have to pay an attorney. Chip and Allyn have already helped a lot of people, and they want to extend an incredible offer out to you today! For a limited time, they are offering their pro level of FTC Guardian at a special rate.

What do you get when you become a pro-level member? Well, first of all, you’d expect to have some way to understand the process in a simple way. That’s why they are offering a blueprint that lays out everything in a very easy-to-understand manner. The program also includes customized documents that generated with RBDA technology. If you remember, Chip had this technology developed for his own law practice, and you are going to be able to take advantage of this software as well when you join today.
FTC Guardian is not a program that offers just a few simple forms that Chip has put together to sell online. There are over 85 documents that were created for this program, and these are the same documents that he uses for each of his clients on a daily basis. Furthermore, these documents are customized according to the business they are being used for. The way this works is there are software and a massive database of clauses. The software attempts to replicate what Chip or any other attorney would put together for their clients.

Let’s say that Chip was interviewing you about your business. He would ask you questions, and you would answer those questions. Based on your answers, he would create the documents needed for your business. The RBDA system follows this same process. It asks you questions, helps you to answer those questions, and then at the end of the questionnaire, you hit the “Submit” button. The software goes through your answers after that, and it pulls out the clauses that need to be included in accordance with the answers you provided.

As part of your membership, you’re also going to get done-for-you documents that will protect you right now. The documents that you’ll be receiving include:

- **9 for Basic Website Compliance**
  - Terms of Use
  - Privacy Policy

- **9 Supplemental Website Compliance**
  - Model Release
  - Continuity Plan

- **15 Intellectual Property Protection**
  - Collaboration
  - Non-Disclosure

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There are approximately 80 documents in the collection at this point. If you look at the first two categories, the terms of use and privacy policy are examples of basic website compliance documents that you will need to have. The privacy policy contains a lot of information pertaining to remarketing and retargeting. There are also supplemental documents such as a model release and a continuity plan. If you take videos or photographs of someone, you’ll need to get a clearance, and then if you have membership site, you’ll need to have a disclosure for your continuity plan. So, there are a number of basic documents and supplementary documents for your website.

The screenshot above shows an example of what you would pay to acquire proper legal documents elsewhere. As you can see, for an unlimited use license of 4 legal documents it would cost $2,788 or $997 a month for three months. Separately, the documents would cost $697 each. Obviously, this is expensive, but the other challenge with going this route would be staying up to date. As previously stated, you would have to put an attorney on retainer or revisit them to make sure there aren’t any updates you need to make. With FTC Guardian, you’re getting each of the following:
• Strategy Videos ($997)
• Hangouts 2x per Month ($2,400+)
• Compliance & IP Docs ($597)
• Marketing & Promotional Docs ($597)

By the way, some of the questions that come up in the software are only asked of you because of previous answers you’ve given. So there’s branching logic involved. All of the clauses that are required, according to the answers given, are assembled into a full document. It only takes 3-5 seconds for a document to be generated by the software. This is an amazing system, and again, Chip uses it every day in his own law practice. As a pro member of FTC Guardian, you’ll be able to leverage its power too!

In addition to the blueprint you’re going to receive, and the powerful software, compliance training is also included within FTC Guardian. In this training, Chip talks a lot about the rules and some about strategies that would work in certain marketing scenarios. These videos are typically about 3-5 minutes long. This has been done purposefully so that this training is easy for members to consume.

Here are some of the topics covered by Chip in the video trainings:

• What You Need to Know About the FTC
• Website Legal Compliance
• Outsourcing
• Using Material of Others

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The entire program is powerful, but one of the most helpful parts of it is that Chip offers further training to his members by providing them with access to live hangouts with Q&A. These are held twice a month, and each time, Chip focuses on a specific topic in a very targeted manner. After this presentation, the floor is opened up for some Q&A. During these sessions, not only can you ask about the topic being covered, you are free to ask anything that you want to related to your business. According to Chip, this is where it really gets good because it’s on these calls that various strategies are often discussed.

FTC Guardian also has trust seal rights, meaning that you can use the seal on your sales pages, websites, etc. This helps you build relationships with your customers so that they know, like, and trust you.

The FTC Guardian trust seal can be used on a checkout page. You’ll find a trust seal at the bottom of their privacy policy as well. A lot of members use this seal as well because it gives their pages that “know, like, and trust” feel.

If you were to click on this seal, a verification window will appear, which tells your customers and visitors to your pages that you’re a member in good standing. It also shows that you’ve been through the training and that you have generated your legal documents to the best of your ability, by using FTC Guardian. The verification window is displayed below.
In summary, FTC Guardian was built so that you could pull together the marketing and the legal aspects of running an online business. There’s nothing out there like this. Of course, there are attorneys practicing internet law. However, it’s very expensive to hire a lawyer, and unless you keep one on retainer so that you can go back and get more advice from them every quarter or so, there’s no way to keep up with the rules as fast as they are changing. FTC Guardian offers a solution for this.

So what’s the “real world” value of this valuable FTC Guardian package?

**Total Real World Value: $4,591**

Pro Membership

- Strategy Videos.......................... $997
- Hangouts 2x per Month............... $2,400+
- Compliance & IP Docs............... $597
- Marketing & Promotion Docs........ $597

**TOTAL REAL WORLD (Conservative) VALUE........... $4,591**

Just 1 Payment of **$297** (one full year)

(if just $10 per month thereafter, until you cancel)

If you have had any experience hiring an attorney at all, you’d probably agree that this estimation is very conservative. Chip and Allyn know that they could charge a lot more, but remember, their goal was to make a difference. Even at the prices they charge regularly for the service is a great deal, but today, they want to extend a very special deal to you. If you join FTC Guardian now, you **CLICK HERE Now to Access “FTC Guardian” (and Grab Jay’s $475 Bonus Package)**

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can gain access for one full year for just $297! Then, it only will cost you $10 a month after that, until you decide to cancel. Also, if you know that you want unlimited access to all of these tools, training, resources, customizable documents, as well as lifetime access to Chip on his Live Q&A sessions (without having to worry about paying the $10 monthly charge after 12 months), I recommend that you choose the Pro Business Owner option for a one-time investment of $497.

Click here to access FTC Guardian while this “Jay Special” discount is still available this weekend:

http://www.ftcguardian.com/jay

These men are doing this because they want people who are just getting started to be able to afford the service. The last thing they want is small business owners to get slapped by the FTC right when they are first getting started and before they’ve even had the chance to begin building a good revenue stream.

At this point, you’ve seen a lot of horror stories, and if you’re typical, you’re probably a little concerned about it. Chip is the first to say that it’s not your fault that you’re under such scrutiny. Most of the people reviewing this material are probably pretty ethical. If you weren’t, it isn’t likely that you would be looking at this at all. You’re trying to do the right thing, but the problem is that you don’t know what you don’t know. You don’t realize that you’re not legal in some areas. That’s no excuse. The FTC doesn’t give warning tickets. This puts you at a high risk when it comes to your assets.

A lot of people would want to point figures at the FTC, but it’s really this tsunami of a drill down that they are currently doing. Chip does have a recommended solution though, and that is a membership to FTC Guardian. This is a membership that you can join, and it will help you

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through the process of becoming compliant very, very easily. This is quite beneficial. To begin with you get a blueprint, and the first step is to learn as much as you can about FTC rules and regulations.

What if your investment would save your business and family assets? How much would that be worth? Of course it would. Everyone would like to answer “yes”. There’s no way of knowing that using this process to become compliant actually saved you from a disaster or not. You can think that it might or probably did, but there’s no way to be sure. However, what if all you and your spouse can finally have the peace of mind that comes along with knowing you’ve taken reasonable steps to protect your business and family assets? Would that be worth investing in? For most people, that would definitely be worth it.

What would be some of the reasons that people would not jump in and make this investment? Some of the answers that Chip has gotten in the past are:

- I don’t like lawyers
- I believe that lawyers will harm marketing
- I believe there’s a lot to learn
- I believe it takes too much time
- I’m not sure it will make a difference

Chip says that if you don’t like lawyers, there’s not much he can do about it. He understands why people don’t sometimes. If you believe that lawyers will harm your marketing, you’re probably wrong about that one. Contrary to popular belief, most lawyers aren’t going to point your finger at you saying “You can’t do this, and you can’t do that.” What Chip and his team members try to do is estimate the risk. There are scenarios where there is a gray area and you can assume certain risks, but the important thing is that it’s a calculated risk. You understand what you are doing. It’s not like you’re a bull in a china shop that doesn’t understand what risks you are taking, or hanging yourself out there and exposing yourself without really knowing why.

Take whatever calculated risks you want to. It’s a lawyer’s job to point out what the risky areas are and what to do about them. As a business person, it’s your job to decide what to do with the things you have learned. You might believe that there’s a lot to learn and that it would take too learn everything involved. That could be correct, if you were going about it the old-fashioned way. It’s all been simplified for you in this program, however.

In Chip’s opinion, there’s never been a better time to act than now. If you remember, the first takeaway that you were asked to keep in mind was “Successful marketing strategies reflect built-in legal strategies.” As a marketer, you probably tend to think about this all the time. The fact of the matter is that if you don’t implement these legal strategies, you’re flying blind, and
you’re probably sending out an open invitation for some kind of trouble from the FTC sometime down the road, and hopefully, not too soon.

You’ll want to build in these strategies as you grow your business. What you don’t want to do is put it off until later on, and then when you reach some sort of point of success, start worrying about the legal stuff after that. The problem with that strategy is, not only are you open to trouble that whole time, but you’ve already built your funnels and everything else, and you should have been building this stuff in all the while. It’s really a fallacy that it’s better to start this process later on. You need to start using this as part of your business’ structure all along the way.

What it really comes down to is that there’s really just too much at risk to procrastinate. Let’s say that you’re on an interstate highway and the posted speed is 70 miles per hour. Well, you think to yourself “I’d like to get there a little quicker, so I’ll set the cruise control on 75. That’s not too much above the speed limit, and it will be okay.” You’re probably right. The chances of getting caught are so slim that you probably won’t. Plus, if you do get caught so what? You may have to pay a fine of maybe $100 or $150, and you can handle it. It’s far different when you are sued by the FTC. It is a life changing event when this happens to someone.

You could end up with a massive debt for the rest of your life that you can’t file bankruptcy for. That’s personal liability and family assets. There’s no way of knowing how likely it is for this to happen to you. That’s what’s really scary. This is a function of what you do, and having these key elements in place is required by law. You might be able to squeeze by without implementing this stuff for a while, but certainly not forever, and if you do get caught, the consequences are extreme.
The thing is that this really isn’t that complicated. You just need to start taking steps to ensure that you’re compliant and begin adding more strategies in as you grow your business. Chip promises that if you sign up today:

You’ll be happier
You’ll be more successful
You’ll feel more freedom

Or

You’ll get your money back with Chip’s 30-Day Money Back Guarantee!

You’ll be happier because you won’t always feel like you have to look over your shoulder, and you’ll be more successful because you’ll be able to start concentrating on the growth of your business instead of the relentless rules that you have to follow. If you don’t feel happier, more successful, and freer within 30 days of signing up, you’ll get your money back. This a no-questions-asked guarantee as well.

If you’re ready to protect yourself and your business from the “long arm of the FTC” and get peace of mind that you’re protected from any unwanted attention from this powerful agency, you must act now.

Don’t wait another minute...enroll right now at this link to enjoy the ultimate feeling of “peace of mind”: [http://www.ftcguardian.com/jay](http://www.ftcguardian.com/jay).

CLICK HERE Now to Access “FTC Guardian” (and Grab Jay’s $475 Bonus Package)  
(NOTICE: This Special Offer Disappears Sunday, July 23rd @ midnight PST)
Jay feels that what he has put together will be really valuable to you, and that it’s completely complementary to what Chip has put together in his program. His bonus is shown in the screenshot above, and as you can see, it’s a bonus that’s all about how to protect your online business. The first portion of this is Jay’s course on how to protect your PayPal account.

This training is called Payment Protect, and he originally sold this for $297. It contains all of his knowledge on this subject. He has had his PayPal account shut down at least three times in his online marketing career. “Believe me it is no fun”, Jay says. He did learn exactly what to do about it though, and he built this training to help others learn to protect themselves so that they never land in the same situation.

If you ever process anything through PayPal, or plan to in the future for your online business, you need this information. In the training, Jay shows you exactly what he did to get his PayPal account back in good standing. He actually has a PayPal project manager that he is good friends with now and can call up anytime. However, when he first signed up and they saw vast amounts of income rolling in, it raised some red flags.

That’s the other side of the coin of being a successful online marketer. They shut down his account until they made sure that he wasn’t dealing illicit drugs or whatever it was that they thought. The PayPal “police” called him up on the phone and grilled him. It took him about
two weeks to get his PayPal account back. So, he is sharing this experience to show you what he did, and what you can do wherever you’re located, to get your PayPal account back within four hours time. That’s what Jay was eventually able to do.

Hopefully, this never happens to you; it’s a real nightmare. If it ever does, you’re going to be prepared because you took advantage of this training. This training also includes a special report titled “PayPal terms of Service Explained” as well as a PayPal letter that he sent directly to a back office in PayPal. He calls this “My Magic PayPal Letter”, and it contains an email address that you can use if you ever want to connect to the back office. Also included are three other useful PDF cheatsheets. They are:

- 15 Things to Do if Your Account is Limited
- 18 Rules to Keeping Your Account Safe
- PayPal Acceptable Use Policy

You’re also going to be presented with some alternatives to PayPal. Jay uses a merchant account to process credit cards. If, for whatever reason, his merchant account goes down, he has PayPal, and if his PayPal account goes down, he has his merchant account. That way, if something strange or unusual happens, he’s still in business. Unfortunately, a lot of people don’t have these sorts of backup systems in place. So, Jay is providing you with a complete training on how to set up a merchant account, how to keep it in good standing, and what he recommend when it comes to signing up for one.

Jay has had his merchant account for over four years now, and he completely recommends this service. In fact, you’re going to get a link directly to his merchant account manager. Also, if you’re looking for a shopping cart, it can get a little confusing because there are so many options out there for you. Some of these options cost thousands of dollars, and some are much less expensive upfront, but they may take a lot of the top when it comes to their fees. Jay uses Nanacast exclusively for all of his products and highly recommends them. So, he is providing you with training that will tell you everything that you need to know about setting up a Nanacast shopping cart to get up and rolling.

Whether you are selling low ticket items, high ticket items, or whatever else it may be, you can process them all through Nanacast. The service will also allow you to integrate PayPal and your merchant account. It’s incredibly flexible and super-powerful. Jay considers Nanacast “kind of the Cadillac of shopping carts”. It’s got a bit of a learning curve to it, but you are going to be shown everything that you need to know in this training. That way, you’ll be up and running with Nanacast before you know it.

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Do you have an LLC? Would you like to? Are you doing business overseas and would like to have an LLC inside the US? No matter what your particular case is, you are going to learn just how you can go about setting one up. Jay’s father is actually an attorney as well as an expert on setting up LLCs and helping people do so abroad. Well, Jay “twisted his arm” and got him to provide a complete training on setting up a LLC and the best practices for doing so. In fact, he was more than happy to create this training.

Jay’s exclusive bonus also includes some software. These are shown in the screenshot above. You can use these plugins to integrate PayPal on any WP blog page of yours. There’s also a plugin for AlertPay, which is another PayPal alternative that you might want to consider. You are also going to get four more special reports on top of everything else. These are titled:

- How to Set Up Your PayPal Account
- How to Create a “Buy Now” Button
- How to Create and Manage Invoices
- How to Create Reports

This bonus package is valued to be worth $497 in itself. It’s not available anywhere else on the Internet. Jay hasn’t even offered this in over two years’ time, but this is going to allow you to leverage the training, leverage the expertise, protect your business, and move forward in a
robust way this year. Jay says that he’s really happy to be able to offer it in conjunction with Chip’s amazing offer.

You’re going to be able to get tons of value with this exclusive bonus, and you will be able to use it in combination with FTC Guardian to not only build your business but protect it as you do so. Now, take note that this bonus will be delivered on Monday morning after time expires on this exclusive weekend special offer.

Lock in your lifetime membership to FTC Guardian right now by clicking on this link: http://www.ftcguardian.com/jay
What People Are Saying About FTC Guardian

Needless to say, people were thrilled with the information presented in this Live Workshop, and the incredible value that Chip made available with this software, instruction & ongoing live trainings and support. Here are just a few comments posted in our JJ Fast Webinars Group:

Mary Jo Monteith
1 min
Thank you so much for the Chip Cooper webinar! WOW! Who KNEW? Not me! I just signed up for this invaluable information. I have more than one area of need. We have a small farm with alpacas and are just setting up our e-commerce site! I am just completing my first Kindle books and this information is so timely. Your bonus for PayPal information is just wonderful! Thank you Mary Jo.

Curt Gushi 😊 feeling cool.
2 mins
just got FTC Guardian today - for peace of mind doing business on the internet.

Gloria Lundholm
3 mins
Thanks Jay for offering the FTC compliance Pro Membership; I am in. I feel I will be safe legally using this software and training for everything I do online. I know how important it is to be up to date with Federal and CA. Laws.

Tracy Minot Dell’Acqua
4 mins
Thanks for the peace of mind Jay! This is why I joined the FTC Guardian!

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Len Thomson
Just now

I just purchased the FTC Guardian lifetime membership. While I don't live in the USA, my clients/customers often do. I really don't understand US law, but much of it is similar e.g. Privacy, copyright does apply worldwide. This membership gives me all the basic information to keep my online marketing and kindle eBook compliant. As well as being able to stay current on changes, and even ask questions of the legal and marketing experts as regulations change, my business changes? At the low lifetime membership price, this was a no-brainer! So now I will have all the resources I need to protect my businesses in the USA and outside.

Jaye Winburn
11 mins

Chip Cooper...My new "Guardian" is now in place to protect me as I continue to jump completely into the pool of Internet marketing and eComm...as I transition from my corporate job, this is the right program to help me navigate through potential FTC land mines. I come from a heavily regulated environment and know the importance that ignorance on fire can eventually get you in trouble. #LifetimeProtection

Jan Gagon
14 mins

Hi Jay, I'm in FTC Guardian. Thanks for saving our ..., at a price less than 1 attorney visit.

Robbie King
37 mins

I joined FTC Guardian for the peace of mind. Thanks for sponsoring!

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Michael Gange
17 mins
Hey Jay, I jumped in to partner with FTC Guardian today because I wanted peace of mind.

Barbara Glenewinkel
16 mins
Hi Jay! I just got the FTC Guardian because I feel it is the most important program that I can get to protect myself and my business. It was a great presentation, and a great offer. It's hard to decline protection for life! Thank you for this. I look forward to your bonus as well!

Jody Shumaker
59 mins
I just purchased the FTC Guardian program. I feel better already knowing that my I will be legally protected with my online businesses. Looking forward to receiving your terrific bonus!

Dan Francis
1 hr
Jay all the information Chip, Allen and yourself are providing can only be of the utmost importance for life.

Glena Stephenson Thanks as I listened to the Webinar, I realized that fears about legal issues have had me in a holding pattern regarding creating any online business.I will be purchasing tomorrow

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Fantastic webinar with Chip Cooper and Allyn Cutts of FTC Guardian tonight. The FTC is one of the few entities that doesn't have to respect the legal protections you set up to separate your business and your personal assets. For a single, lifetime fee that is less than the cost of a single hour of consultation with an attorney, FTC Guardian proactively integrates legal planning into your business planning. And they are offering ongoing access via twice a month Google Hangouts with an attorney (Chip) and a marketer (Allyn) to help keep you aware of emerging issues, and you can ask questions about challenges you have encountered in your own business. Jay has added a Paypal protection bonus that limits the chances of being shut down and put out of business - temporarily, or permanently - by PayPal. Awesome, awesome deal! If you didn't get on this webinar tonight, take advantage of the replay or PDF. You will not regret it. I am an attorney myself, and this deal is a total no-brainer whether you are a complete newbie, or have been out there taking risks building a biz for a long time.

I just bought the FTC Guardian program after listening to Jay's training today. I'm an author, and want a privacy policy that meets what I need and not just a cut and paste thing. I'm also about to start collaborating with a co-writer in 2017 so was interested in seeing the additional documents included.

Just got the FTC Guardian program. I keep seeing all sorts of potholes for all of us who try to have an online business. My area is information on alternative therapies - an area full of risks for so many different reasons.

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Eve Brown
29 mins

Great info FTC Guardian webinar today! This is so vital to all people in business for themselves online.

Grieg Iversen
I bought this because it’s one of those things I haven’t needed yet, but when our government gets involved, I would rather be safe. A one time payment and the bonus. Crazy deal! Ignorance hasn’t hurt yet.

Norva Semoy Abiona
25 mins

Hi Jay I'm in because I need it for my business.

Kathie FitzPatrick
32 mins

Hi Jay it's Friday 4-1-116. Loved the webinar with Chip Cooper and FTC Guardian. I'm in! Just bought it. I need that bonus!–Kathie

Kathie FitzPatrick
I jumped in because I'm just getting started trying to market my children's book and there will be more. I am also learning affiliate marketing with Sara, and am trying to be wise and trying to careful!

Carol Cavazos
52 mins  •  Tempe, AZ, United States

For the price of an hour with an attorney, I felt FTC Guardian was a good investment - I signed on! Looking forward to receiving your PayPal Protection information as well. Thank you Jay.

DrKaz Says
53 mins  •  Arlington, TX, United States

Hey Jay - just purchased Chips program and would love the bonus you offered just now! Great Webinar -

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Michael Susca
14 mins
You asked and wanted to know why I "jumped in." I have a story I am writing I plan on putting onto Kindle, and am learning this is more than a simple write and post process. Your webinars seem honest, informative and client supportive. which I greatly appreciate. I am older, techno-naive, developing cynicism through this process, but feel I have a worthwhile story to share. It just doesn't seem as simple as I originally thought and your webinars seem to help people through the process. That's why I jumped in. Thank you.

Alina Niemi
31 mins
I wanted to know what I wouldn't have known that might have gotten me into trouble!

Eucabeth Akoth
35 mins
Great training - FTC. I have always known that there are legal related issues that comes along with any business. I have been trying to find someone to answer my question. Also, I am in the process of publishing my 1st novel traditionally, so this will help. This price is a gift. Thanks again!

Anne Macleod
54 mins · Vernon, BC, Canada
i am in. I ought this package because i really can't afford to have my meagre assets frozen and i want to be in compliance with the law, even if the law is US law.

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Nellie Thomson Williams
Just now · Phoenix, AZ, United States

Chip Cooper really knows what he’s talking about. I’m all about ‘prevention’ and had NO hesitation saying YES to his offer. Thanks, Jay.

Preston Linville
29 mins

Just joined the FTC program. I’m starting my own business now and I want to be compliant.

Peter Vasquez
32 mins

Hey Jay! Wow this is an unbelievable value for FTC Guardian! Small price to pay for such a huge piece of mind. I had no idea about so many of the ways a person can end up in the FTC spotlight! Thank you and Mr. Chip so much for making the lifetime membership available....I'm definitely in.

Mike Albert
32 mins

Joined the FTC program, as I am creating a membership site and think it wise to be prudent, especially as I will be collecting recurring payments.

Linda S Taylor
43 mins

Jay -- Thank you to you and Chip for the FTC training today. I jumped right on FTC Guardian since my family talks all the time about running your own business and what can happen without legal protection. I’m about to go live with my website and business and have been nervous about protection. After this, knowing I’m safe from the FTC, I’m going for an LLC here in Nevada as well. Then I just need to concentrate on helping my clients and selling! Great offer. Can't wait to see the personalized docs.
Larry Schardt
12 mins

I joined FTC Guardian because I want to be in compliance with FTC regulations. I also joined because I am a speaker and am interested in the speaking contracts, and other resources, that are available. Thank you and Rock 'n' Roll!!

Michele Barard
28 mins

I signed up for FTC Guardian because Chip provided so much useful information about how to protect my business from certain legal situations like lack of agreements with contract artists and carelessly written privacy statements. I will be reassessing my site and business documents using FTC Guardian. Thanks, Jay and Chip!

Paul Slater
33 mins

Hello Jay:
I order FTC Guardian because I felt I needed to know FTC rules as I am now writing more through my publishing company Amazing Grace Press.

Theresa Sorenson
34 mins

I took the membership from the FTC Guardian to provide me with the much needed legal support I need to protect my business! Thankful for the peace of mind. Thank you for bringing this webinar to our attention and for this wonderful opportunity as well as for your bonus.

Karie Alton
37 mins

Hi Jay, regarding FTC Guardian, it's just too good a deal to pass up!

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Donald Dominko
18 mins

I think that FTC guardian is like car safety belt for business.

Marc Horton
18 mins

I have been an internet marketing consultant for 10 years in large corporate environments. I've recently started consulting for small business clients who want a larger presence online and this is THE single most important service for anyone doing business online. You wouldn't drive without insurance and you should not start an online business without this valuable info. This is seriously an essential game changer. Thanks Jay and FTC Guardian!

Laurie Hall
23 mins

Great Webinar! I'm in to learn all the finer, legalistic things one needs to know. When doing any kind of online business and all the advantages, made for you documents, ongoing training, hang outs...etc included for a lifetime. Thanks!

S Dionne Rodrigo
24 mins

Don't want to be sued at all. That would be terrible for an international. Multiple those amounts by 10 and that would be a death sentence. So I got in to protect myself as I start on my IM business journey.

Ria Morris
9 hrs

Being compliant is of utmost importance. Why risk losing years of hard work, by being uniformed? A small price to pay for crucial and valuable information...all that and sleeping well at night!
Sharon Carlson Williams: I just bought this. Two reasons: one time lifetime and Jay’s amazing bonuses
1 hr · Like

Marla Dantly: Thanks Jay! I feel more secure that I have this coverage. Your bonuses are great and Chip’s FTC Guard with security for one fee for life is a steal. One hour of work with a client, my fee is all I needed to pay to have this security for life. This is a No Brainer!! Thank you!
50 mins · Like

Barbara Buntin: I’m in because you guys worried me to death. I can’t handle not doing something right. The results of a Catholic upbringing and having been a real estate
42 mins · Like

Sherry Schott Bowers: I’m in because I have seen clients unwittingly get into trouble. I am a small guy now but want to be in business a long time. Financially even this great deal was a stretch... but I did it anyway because it is that important. Thanks Jay for hosting webinar and offering these tools.
36 mins · Like

Mary Mandeville: This is great information. I need this for my business just like needing insurance for my house and car.
28 mins · Like

Jo Ann Live: I’m IN! I was skeptical when my partner suggested watching the webinar but you allayed my fears and proved WE NEED THIS! Thanks for the valuable content and the assurance. Great Bonus JAY - Very generous.
25 mins · Like

Mick Martin: This is must know information for everyone.
24 mins · Like

Katz Marli Petrowich: I’m in. This FTC Guardian will give me peace of mind and answer all my unanswered questions. Your bonus is the icing on the cake.
23 mins · Like

Joan Pollock: Excellent information! No one wants to experience any of the nightmares outlined. Yikes!
18 mins · Like

Cindy Dixon
26 mins

Thank you so much Jay! This webinar offered amazing information. I purchased the FTC Guardian to safeguard my business. Awesome value at such a great price!

Kirk Laidlaw
27 mins

Me - I was naive and in denial. Really just wanted to keep my head in the sand. Thx for packaging this.

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Ben Maitz
6 mins

beware the FTC

Janie Sue Hauck Nagy
11 mins

FTC Guardian seems like a no-brainer for anyone operating an online business. It provides the information needed to help stay out of legal trouble.

Johnny Walker
13 mins

Jay Boyer is not only a skilled carpenter...... He is a MASTER of MARKETING. He provides value and expertise to the Internet field. I am greatful for the material that JAY & FTC GUARDIAN is offering and I did not hesitate to accept their fabulous offer to protect my business affairs.

Ishmae Lewis
16 mins

Thanks Jay you rock always....

Lorene Collier Purcy
This is some much needed information - Better safe than sorry and you can't get this much protection for the cost!!!

Lola Bahri
Just now

Thank you for the webinar -this timely offer and the bonus Jay.

Lolis A. Armstrong
3 mins

I am sooo excited to have ben able to get on this informative webinar. This makes me feel a great comfort to know I will be compliant. Thanks Chip, Allen and Jay great job all. Definitely an eye opener.
Mark Burns
1 hr

Hey Jay, I just signed up for FTC Guardian. I'm just going through the membership site now. But I really bought this because I have been looking for affordable custom Legal documents that I can generate when needed for my sites. It has been hard to find legal advice from Lawyers that are real Internet Specialists. Just listening to Chip Cooper tells me right away that he knows what he is talking about.....Thank You!

Nancy Fox
1 hr

Jay, This info is so important - and we don't want to think about it - but it just makes sense to not stick our heads in the sand...and your bonuses added even more value. Thank you for bringing the law to us!

Kim Thompson-Pinder
1 hr

Thanks so much for the webinar Jay. Very informative and I realized that there are things I need to do. I am looking forward to the piece of mind that I will have.

Bob Morrow
1 hr

Excellent presentation. How could you not buy this package - especially at this price.

R Steven Thompson
3 hrs

I'm IN! I ordered later on last night. Please copy me in for your bonuses, Jay 😊. I was a TV journalist for a number of years and have always known the importance of model releases for photos and videos (any one or thing or animal that is identifiable...getting a release. And I've wondered about the rights to works outsourced to "artists" on fiverr...It looks like this FTC Guardian can help us better protect ourselves and copyrights as Indie Publishers. Thanks Jay.

Harold Beach
9 hrs - Clearwater, FL

Sounds like vital information.
Kelly Kramer
57 mins

Great presentation, I bought FTC guardian, and will go through it later on tonight.
Thanks

Cindy Dixon likes this.

Kelly Kramer I jumped in as the amount of information I get for the price is huge...and everyone could use this stuff...
47 mins - Like

Ellen Mencer
53 mins

Just purchased the FTC Guardian package. Thanks Jay. Already feel a sense of relief at having made this decision!

Tom Simandi
54 mins

Been meaning to sign up for FTC Guardian for awhile now as the help it gives for webmasters is excellent. I'm aware of Chip from another source and work he did for them and was impressed. This deal was too good to pass up and tipped the scale in favor of signing up now.

Rick Price Jay Thank you for providing this opportunity with FTC Guardian. I took advantage of the offering as anyone should that is serious about their online business. Better safe than sorry!

Cynthia Pottala
3 mins

There are not words to express what a great offer I think this is. I am constantly worrying about copyright laws, liabilities, etc. I think I will sleep better now

Michael Brue
10 mins

Just bought FTC Guardian together with Jay's bonus. Grab it! This is well worth the money for peace of mind. My wife feels much better about my starting a web business. Jay's bonus alone is worth the price of FTC Guardian. And the FTC Guardian material is superior, the best I've ever seen.
Jd Barber
33 mins
I'm just starting my IM business and want to be protected and setup properly. I also want Jay's FTCGuardian bonuses!

Frederick Jones
36 mins
Thanks Jay Boyer! I'm all in for the one time lifetime FTC Guardian membership.

Sandrilia Palmer
40 mins
Hi! I had to purchase the FTC Guardian since I missed the offer a couple of years ago when I saw a similar offer. However, my website is being built as we're speaking and I really need this added protection. GREAT timing!!

J Ray Smith
46 mins
I have been paying a lawyer to draft contracts for my publishing business. He does a great job, but he charges more for one hour than the FTC Guardian costs for lifetime membership. This is a "no brainer". Thanks for bringing it to my attention.

Lauren Reed
23 mins
Jay, again a valuable webinar! Chip Cooper made an amazing offer providing online legal pages with ongoing hangouts training. Your bonus is most valuable, too! I will be "IN" tonight when I am at home with my credit card!
Darrell Lischka
Yesterday at 12:48pm

I just joined the FTC Guardian membership after watching Jay’s awesome webinar with Chip Cooper.

The webinar was top notch and lots of golden nuggets by Chip and Jay....

Here’s why I really joined...

Although I live in Canada, I have always been concerned about conducting any business in another country, including the United States.

In the back of my mind, I have always remembered Frank Kems extensive blog post about what it’s like to get sued by the FTC. I never want that to happen to my business or online activities....

Just because you live in another country and think that it doesn’t apply to you, good luck...Chip goes through several examples of people living in other countries and how the FTC were successful in suing the individual and holding them accountable. I was shocked at the large fines and I mean large as in the millions....

Grab it while it’s at a great discount...Seriously, this is a no brainer...

Lois A. Armstrong
Yesterday at 1:06pm

I am soo excited to have been able to get on this informative webinar. This makes me feel a great comfort to know I will be compliant. Thanks Chip, Allen and Jay great job all. Definitely an eye opener.

Anna-Stina Johansson
Yesterday at 2:00pm

I’m in because I want to protect my business. Thanks for a great webinar and bonus!

James Mason
Yesterday at 1:39pm

I’m in...

I am developing some software and apps and do outsourcing, so I need some of those documents...

And, I should update what I have on my sites, since what I have is about 12 years old...

Thanks for the webinar....

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John Ragan
2 mins · Mesquite, TX

I now believe the IRS is the "good" cop.
The FTC is scary. Don't wing it - get FTC Guardian.
I suppose to be on the safe side, I should say I expect to receive a free bonus for my testimonial.

Robert Faith
6 mins

I jumped in today and joined FTC Guardian because I believe it is important to protect my business and personal assets which in turn protects myself and my family.

Chuck Wood Jr.
7 mins

Good Information regarding protecting your Business, Church and or Ministry websites from FTC violations.

Nan Becklean
13 mins

I signed up for FTC Guardian because, as an author with websites and outsourced materials I realized TO MY ASTONISHMENT that I'm in need of various documents and much help to be sure I'm in compliance with the Federal Trade Commission. Yikes! Thanks very much Jay!

Anne Boyes
Definitely was worth attending. I've had "similar" plans in the past and they dissolved into crickets. As a retired physician, I know well how important good legal advice is priceless. I trust Jay and this company has good rep online.
Like · Reply 39 mins

David Mason
Just Joined to get lifetime updates to my old TOS and Privacy Policies as well as many other legal documents. Great deal for a one time payment!
Like · Reply 35 mins

Peter Vasquez
Hey Jay! Wow this is an unbelievable value for FTC Guardian! Small price to pay for such a huge piece of mind. I had no idea about so many of the ways a person can end up in the FTC spotlight! Thank you and Mr. Chip so much for making the lifetime membership available... I'm definitely in.
Like

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Now’s the time to join the dozens of other folks that are thrilled to use FTC Guardian moving forward to protect themselves and their online business. But you must hurry, because this special price will disappear on Sunday at midnight, Pacific time.

Don’t wait until it’s too late, take action now: http://www.ftcguardian.com/jay
Don’t Wait Until It’s Too Late...Protect Yourself Now

It is now time to take action. You need to get out of the high-risk place you’re at right now and move to a safe place. There are a couple of things that may be stopping you from taking action right now. The biggest problem is usually just old-fashioned procrastination and then you may be telling yourself that you want to look around for a while. That’s fine, if that’s your choice, but if you are going to need to ask yourself the following:

- Is there another complete solution for just disclaimers and documents out there?
- Who created these things?
- Is this person a licensed attorney?
- Does he or she specialize in Internet Law?
- Do I have confidence in the system?

Just think about the dollars per hour it would take to do this by working with a lawyer yourself. That would require some pretty serious cash. You’d have to spend thousands upon thousands of dollars to get these types of documents put together. The site you will be able access contains a great deal of documents to use, and they pretty much cover every angle that you would need to cover.

Again, this program is easily worth a couple of thousands of dollars for what you’re getting out of it. It is all point and click, and very easy to use. Plus, it is constantly being updated. There services out there sort of like this, but they only contain boilerplate general documents that do not get updated. You are going to have access to this program at a huge discount if you act now. It is guaranteed. So, go ahead and click here right now to protect yourself, your business, and your livelihood with this essential training: http://www.ftcguardian.com/jay

This is an amazing offer which will help you to secure your business, so don’t miss out. Get started now!
Questions & Answers

I am not based within the US. Does this affect me?

Yes, I'm afraid so. Here's why: The FTC’s mission is to protect consumers who are located in the US. So their position is that regardless of where you are located, if you are selling into the US and affecting US consumers, then the FTC has jurisdiction over you. They do actually go after people that are located elsewhere.

There was a massive case concerning a Canadian guy named Jesse Willms a few years back. There was a $350 million settlement in this case, and he had his house, his car, his pool table, and even his wife’s fur coat taken away from him. He lived in Canada, his service was in Canada, and his business was in Canada. He did use a lot of affiliates that were located in the US.

There’s also a case where a guy in the UK operated some dating websites. You could join these websites for free, but in order to get people to upgrade to a paid membership, they used fake ‘flirts’ (or whatever you would call them) from fake people. The FTC ended up suing him. So yes, if you are selling anything in the US marketplace online, you are under the jurisdiction of the FTC. They can and will prosecute you. This does apply to you, and you need protection as much as anybody.

So this isn’t a yearly membership, right? This is a one-time investment?

Yes, this weekend only Jay has arranged a special one-time investment of $297. However, after Sunday at midnight the price will return to the regular annual $297 per year fee. This is a very special offer, available only to you as Jay’s subscriber.

Can I use this on an unlimited number of websites?

Yes, you can use it on as many websites as you own. There is an enterprise membership that’s specifically for local marketers who offer services to clients. For this membership, however, you can use it for any websites that you own.
If you’re a distributor for a network marketing company, and you abide by company rules, who gets sued? The company or the distributor?

One way to look at this question is whether or not you’re liable for your affiliates. If you are a marketer who has affiliates, that’s considered an indirect marketing channel. There is authority now through the proposition that if you market through affiliates, you’re responsible for them. In other words, if they are engaging in deceptive marketing practices, and you don’t direct them or terminate them, you’re liable as well.

The FTC is going to go after anybody in the chain of distribution who is making deceptive claims. So just about everyone in that chain is going to be liable to one extent or another. This is certainly true for affiliates that are actually making the claims. They are going to be the first target, but then the FTC is going to work its way back up and basically charge you, if you’re supposed to manage these affiliates, for not managing them effectively. Just about anybody and everybody in the chain is going to get sued in one way or another, either because they directly made the deceptive claims or because they didn’t manage the people who were.

If you are with a MLM or Network Marketing company, one of the things that happen a lot is that individuals create their own websites. Let’s say that you’re marketing for a company, and you create your own website. Well, on this website, you’re collecting names and email addresses. You are responsible for that piece of the pie while the company itself is responsible for other pieces of that pie. Now, it’s likely that whatever company you are working with has done their due diligence and lawyered-up. However, if you are doing the lead generation in the frontend, then you are responsible for that part of it all.

How do you recommend using the FTC Guardian seal?

The intent of this seal is to promote trust. You want your customers to know, like, and trust you and your products. There are a number of companies that offer trust seals for various purposes. They want you to be able to do the same thing with this seal, which is one of the reasons why they aren’t charging extra for it. You can place it anywhere you like, and they believe that it would be a great addition to any site.

There are articles out right now that say a solid trust seal can increase conversions by 20-30%. This trust seal is being provided to you as a part of the documents that you generate. This shows that you, as a customer, have agreed to a certain code of conduct. It shows that you aren’t only ethical but also compliant online. So, you can use this on all of your disclosures and privacy policies. You can also use it on your checkout pages like Chip does. Again, people can
click on this to see that you are indeed a verified member. Chip and his team have seen this increase their conversions by 20%.

**Would these documents apply if I market business to business?**

Yes. Truth in advertising applies no matter what type of business you run. Some of regulations that apply to consumers would not. You’re still going to need a privacy policy even if you’re “B to B”. You’re still going to be collecting names and email addresses on some level probably. Also, if you are operating a “B to B”, you’re really going to want to take advantage of the customer agreements as well as the distribution and promotional agreements. That’s where you’ll really benefit the most from FTC Guardian.

There’s also a SaaS agreement, which covers online services generated by software on your server. In fact, there are three different kinds. Plus, there are a number of different types of customer agreements. The click-through SaaS agreement is what you typically see for consumer-based sales. There’s also a hybrid agreement and an enterprise agreement that you would want to use if you were selling to small-sized or middle-sized businesses. There’s a hybrid doc that’s tailored for this.

You’ll also find that there is a SaaS agreement that’s not click through. This is a “pen to paper” agreement that’s necessary for you to have because larger businesses will not click through on a SaaS agreement. They won’t do it and even have policies that say they can’t. Chip negotiates SaaS agreements all day long. In fact, it makes up a large part of what he does. You’re covered on all three levels for your SaaS agreements, all of which would apply to “B to B”, plus the distribution and channel marketing agreements.

On top of everything else, you even have SaaS reseller agreements. Chip is actually one of the only people in the country that have these. He’s one of a handful of people that are doing SaaS reseller deals. This is a very tricky thing to do, but you can do a service resell. This is particularly hard to do when it’s server-based. There are about five different approaches to SaaS reseller agreements alone in this package, so you really are covered if yours is a “B to B” business.

If we have questions about what forms to use in relation to our business, what’s the procedure?

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(Click Here) Now to Access “FTC Guardian” (and Grab Jay’s $475 Bonus Package)

**(Notice:** This Special Offer Disappears Sunday, July 23rd @ midnight PST)**
You can contact Chip’s Support team (Support@FTCGuardian.com). That would be one way, but a lot of questions are answered under the ‘Member Links’ section of the FTC Guardian site. The ‘Click-Start Guide & Blueprint’, in particular is meant to get you started so that you know what to do. So, that should be the first place that you go, and you can send specific questions to Support. There are also the live Q&A sessions that you can take advantage of.

Now is the time to take action before this special offer disappears. By taking advantage of this time-sensitive “Jay Special” offer, you’ll be locking in the software, training, and live consultations with Chip (as well as Jay’s $497 bonus) for a one-time investment. Which means that if you miss out, you’ll be paying an annual membership of FTC Guardian in the future at the regular price.

Click here to access this ultimate “online security policy,” and get the peace of mind that you deserve: http://www.ftcguardian.com/jay