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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

In Re LinkedIn Advertising Metrics Litigation) Case No.: 5:20-cv-08324-SVK
)
) **SECOND AMENDED CLASS ACTION**
) **COMPLAINT**
)
) Violation of California’s False Advertising
) Law;
)
) Violation of California’s Unfair Competition
) Law;
)
) Breach of Implied Duty to Perform with
) Reasonable Care; and
)
) Breach of Implied Covenant of Good Faith
) and Fair Dealing
)
)
) **DEMAND FOR JURY TRIAL**
)
)
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1 Plaintiffs Noirefy, Inc. and TopDevz, LLC, individually and on behalf of all others
2 similarly situated, bring this Second Amended Class Action Complaint and Demand for Jury
3 Trial against Defendant LinkedIn Corp. Plaintiffs allege the following upon personal knowledge
4 as to their own acts and experiences, and as to all other matters upon information and belief,
5 including investigation conducted by their attorneys.

6 **NATURE OF THE COMPLAINT**

7 1. LinkedIn claims to be the world’s largest professional social network. One of
8 LinkedIn’s primary sources of revenue is the sale of advertisement space on its platform. Users join
9 LinkedIn to make high-quality professional connections, and advertisers use the platform to reach
10 a high-quality audience.

11 2. When advertisers set up their first ad campaigns on LinkedIn, the last screen they
12 see tells them that they will “only pay when someone clicks your ad.” That assurance in mind,
13 advertisers upload their payment details and launch their first LinkedIn ad campaigns.

14 3. Unfortunately, that promise is false. Rampant bot and other fraudulent activity on
15 LinkedIn’s platform mean that advertisers regularly pay for fake clicks. Advertisers regularly pay
16 for fake ad impressions and video views too.

17 4. In addition to charging advertisers for non-genuine activity, LinkedIn falsely
18 represents the fake activity as genuine clicks, impressions, and views throughout its ad-sales
19 process—from forecasted results at the inception of a campaign to reported results as a campaign
20 progresses.

21 5. The automated, fraudulent, mistaken, or miscalculated engagement with LinkedIn
22 ads (collectively “non-genuine engagement”) not only causes advertisers to be charged when they
23 shouldn’t be, it also artificially inflates the desirability of advertising on LinkedIn’s platform. In
24 other words, LinkedIn advertisers think they are advertising to a much more valuable and engaged
25 audience than is really the case. For this reason, LinkedIn advertisers are more willing to purchase
26 ads and willing to pay more for those ads. As a result, prices for LinkedIn ads artificially rose
27 across the board.
28

1 (including those arising from non-contractual disputes or claims) related to this Ads Agreement
2 will be brought in a federal court in the Northern District of California.”¹

3 **INTRADISTRICT ASSIGNMENT**

4 15. This action is properly assigned to the San Jose Division of this District under Civil
5 Local Rule 3-2(c) and (e), because LinkedIn is headquartered, and a substantial part of the events
6 that give rise to the claim occurred, in Santa Clara County, which is served by the San Jose Division.

7 **COMMON FACTUAL BACKGROUND**

8 **A. LinkedIn sells itself as a premium platform for advertisers.**

9 16. LinkedIn was founded in 2003 and began selling ad space on its platform in 2005.
10 Since then, LinkedIn has grown dramatically as a social network and as an advertising platform.
11 LinkedIn passed 100 million members in 2011 and was purchased by Microsoft for \$26 billion in
12 2016. Today, LinkedIn counts over 774 million members, and generates over \$3 billion annually
13 from advertising sales.

14 17. Companies have advertised on LinkedIn because of its self-proclaimed high-quality
15 audience. As LinkedIn tells them, advertisers can “[m]arket to influencers, decision makers, and
16 executives who act on new opportunities.”² “LinkedIn’s audience has 2x the buying power of the
17 average web audience,” and “4 out of 5 LinkedIn members drive business decisions.”³

18 18. That perceived audience quality drove the cost of advertising on LinkedIn.
19 Advertisers did not think that they were paying for clicks, impressions, or views from just any
20 average human audience. They thought they were paying for clicks, impressions, and views from
21 a uniquely valuable audience.

22 19. The perceived audience quality also buoyed the prices paid by all LinkedIn
23 advertisers. LinkedIn ads are sold through what LinkedIn calls “second-price” auctions. A second-
24

25
26 ¹ *LinkedIn Ads Agreement*, at § 9, LinkedIn (July 16, 2020), <https://www.linkedin.com/legal/sas-terms>, attached as Exhibit A.

27 ² *Ad Targeting*, LinkedIn, <https://business.linkedin.com/marketing-solutions/ad-targeting> (last
28 accessed Aug. 17, 2021).

³ *Id.*

1 price auction is an auction in which the winning bidder pays \$0.01 above the second highest bid in
2 the auction. Second-price auctions incentivize advertisers to bid the highest amount they are
3 willing to pay to show an ad to members of a targeted audience, knowing that they will only end
4 up paying \$0.01 more than then second-price bid.

5 20. Because of the second-price auction mechanism, LinkedIn ad prices were
6 determined not only by the winning bidder's willingness to pay, but also by the value perceived in
7 the ads by other bidders.

8 21. LinkedIn's supposedly high-quality audience generated a substantial price premium.
9 A recent report by Falcon.io, a social-media management platform, found that LinkedIn advertisers
10 pay \$5.26 per click on average, as opposed to \$3.56 on Instagram, \$0.97 on Facebook, and \$0.38
11 on Twitter.⁴

12 22. Since at least 2015, LinkedIn has delivered forecasted and actual metrics regarding
13 the performance of its ads through its Campaign Manager interface. Those metrics include
14 "impressions," "views," and "clicks," which are sometimes referred to as "reach metrics." An
15 "impression" is an instance of an ad being displayed to a user such that it could have been seen. A
16 "view" means that the video was actually viewed by the user. And a "click" occurs when a user
17 presented with an ad selects either the ad or the advertiser's company page using a cursor (on
18 desktop) or finger (on mobile).

19 23. Those metrics were used to "grade the success of" marketing campaigns, which in
20 turn allowed advertisers to determine what kinds of ads to purchase, and how much to pay for
21 them.⁵

24
25 ⁴ Maxwell Gollin, *How Much Do Ads Cost on Facebook, Instagram, Twitter, and LinkedIn in*
26 *2021*, Falcon.io (Mar. 18, 2021), [https://www.falcon.io/insights-hub/topics/social-media-roi/how-](https://www.falcon.io/insights-hub/topics/social-media-roi/how-much-do-ads-cost-on-facebook-instagram-twitter-and-linkedin-in-2018/)
[much-do-ads-cost-on-facebook-instagram-twitter-and-linkedin-in-2018/](https://www.falcon.io/insights-hub/topics/social-media-roi/how-much-do-ads-cost-on-facebook-instagram-twitter-and-linkedin-in-2018/).

27 ⁵ LinkedIn, *The Sophisticated Marketer's Guide to LinkedIn*, LinkedIn, 5 (2017),
28 [https://business.linkedin.com/content/dam/me/business/en-us/marketing-](https://business.linkedin.com/content/dam/me/business/en-us/marketing-solutions/cx/2017/pdfs/Sophisticated-Marketers-Guide-to-LinkedIn-v03.12.pdf)
[solutions/cx/2017/pdfs/Sophisticated-Marketers-Guide-to-LinkedIn-v03.12.pdf](https://business.linkedin.com/content/dam/me/business/en-us/marketing-solutions/cx/2017/pdfs/Sophisticated-Marketers-Guide-to-LinkedIn-v03.12.pdf), attached as
Exhibit B.

1 **B. LinkedIn ads were sold through a uniform process.**

2 24. Before advertising on LinkedIn, advertisers first created their LinkedIn pages. As
3 part of that process, each company selected whether it was a small business (fewer than 200
4 employees), a medium to large business (more than 200 employees), or an educational institution.⁶

5 25. Once the company page was established, the LinkedIn advertiser had to use
6 Campaign Manager to create an ad account. When creating an ad account, each advertiser assented
7 to the LinkedIn Ads Agreement.⁷ The Ads Agreement was a contract of adhesion presented to
8 advertisers on a take-it-or-leave-it basis.

9 26. The Ads Agreement provided that every advertiser “agree[d] to pay on the basis and
10 at the rate shown when a campaign, order or other purchase was submitted through your account
11 (‘Rate’), e.g., price per impression, click, other conversion, lead or period, whether with a fixed or
12 automatically optimized bid, whether with daily budget, lifetime pacing, or other budget options.”⁸

13 27. Once a company connected its ad account to its LinkedIn page, it could start setting
14 up its first LinkedIn advertising campaign.

15 28. The first step in launching an ad campaign was to choose an objective for the
16 campaign. “An objective is the action you want your audience to take upon seeing your ad.”⁹
17 Objectives included brand awareness, website visits, engagement, video views, lead generation,
18 website conversions, or job applicants.

19 29. After choosing an objective, advertisers built their target audiences, selected ad
20 formats (for instance, single image, video, or messaging, among others), and then set bidding
21 strategies and budgets.

22 30. From there, advertisers chose the creative content (image, video, or text) that was
23 displayed in their ads.

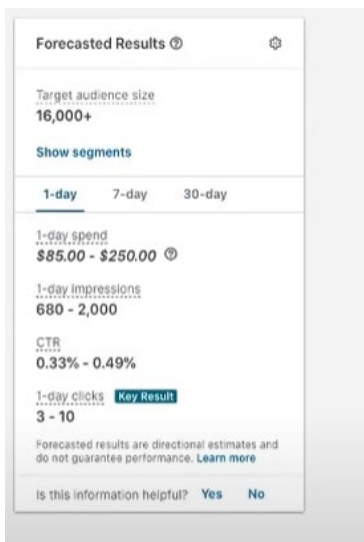
24 _____
25 ⁶ *Create a LinkedIn Page*, LinkedIn, <https://www.linkedin.com/company/setup/new/> (last
26 accessed Aug. 17, 2021).

27 ⁷ *See* Ex. A.

28 ⁸ *Id.*, § 3.

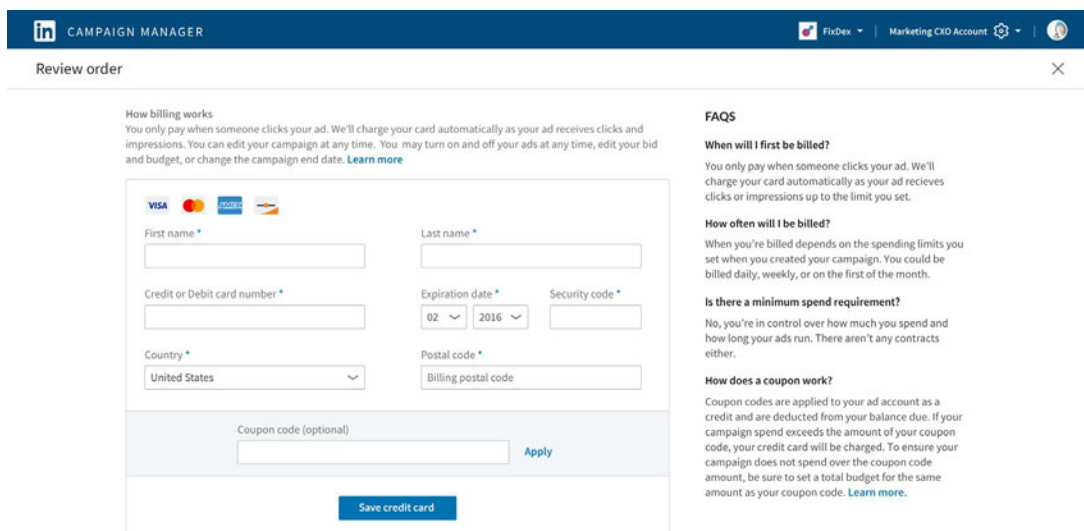
⁹ *Create your first campaign*, LinkedIn, <https://business.linkedin.com/marketing-solutions/success/best-practices/create-your-first-campaign> (last accessed Aug. 17, 2021).

1 31. Throughout this process, from choosing a campaign objective to selecting the ad
 2 creative, LinkedIn displayed forecasted results. Forecasted results are estimates regarding the
 3 expected audience size, cost, and performance of the ad campaign. The particular results forecasted
 4 varied based on campaign objective and other settings, but the format always generally resembled
 5 the following:



15 32. The Key Result label highlighted the ad metric tied to the advertiser’s campaign
 16 objective, which also indicated the metric underlying the Rate charged to the advertiser.

17 33. Finally, before launching its first campaign, advertisers set up payment methods
 18 using the following interface:



1 34. Before any advertiser could pay to run an ad on LinkedIn, then, LinkedIn promised
2 each advertiser that they will “only pay when *someone* clicks your ad.”¹⁰

3 35. Once the payment information was uploaded, the advertiser launched their
4 campaigns.

5 36. The campaign objective and bidding strategy selected while setting up a campaign
6 determined the basis on which advertisers were charged, whether by clicks, impressions, or video
7 views. After the campaign launched, LinkedIn charged advertisers a Rate based on the pre-
8 determined chargeable metrics, each time that metric was satisfied (i.e., each time the advertisement
9 received an impression, video view, or click).

10 37. When placing bids and agreeing to Rates, advertisers relied on the integrity of the
11 underlying bid metrics, impressions, clicks, and views. Put differently, every time a LinkedIn
12 advertiser agreed to a Rate for a campaign, they relied on LinkedIn’s representation that the
13 underlying metric was real. That is, that impressions were impressions before actual LinkedIn
14 users, that clicks are real clicks and not bot activity or accidental clicks, that views are real views,
15 and the like.

16 **C. To monitor active and past campaigns, advertisers depended on LinkedIn’s data.**

17 38. After launching their first campaigns, each time advertisers accessed Campaign
18 Manager, Campaign Manager presented real-time results of the campaigns, including number of
19 impressions, video views, and/or clicks, as well as derived metrics such as click-through rate and
20 video view rates.

21 39. That Campaign Manager interface was a closed network, meaning it was the only
22 place where an advertiser could view comprehensive campaign performance metrics, because
23 LinkedIn severely restricted its advertisers’ access to data about their ads and audience.

24 40. LinkedIn technologically prevented advertisers from evaluating the data underlying
25 LinkedIn’s reported campaign metrics by refusing to provide advertisers with access to raw data
26

27 _____
28 ¹⁰ *Id.* (emphasis added).

1 that would allow them to determine which users viewed their ads, their level of engagement, or
2 whether the users are real humans or automated bots.

3 41. LinkedIn also contractually prohibited advertisers from evaluating the data
4 underlying LinkedIn's reported campaign metrics, with its form contracts going so far as to ban
5 advertisers from disclosing any information about LinkedIn's ad metrics or the corresponding ad
6 pricing to any third party.

7 42. Advertisers on LinkedIn's platform were therefore entirely dependent on LinkedIn
8 for accurate metrics when evaluating how their ad campaigns perform and whether and how much
9 to spend on additional campaigns.

10 **D. LinkedIn lagged behind its competitors in ensuring the integrity of its metrics.**

11 43. Advertising industry and standard-setting organizations have long recommended
12 that closed network advertising systems like LinkedIn engage outside auditors to ensure the
13 accuracy of their advertising metrics. In early 2017, a leading industry association specifically
14 called on closed system advertising platforms, including LinkedIn, to allow independent third-party
15 auditors to validate their metrics.¹¹

16 44. LinkedIn's largest ad-platform competitors, Facebook and Google, heeded the
17 industry calls and agreed to allow an independent auditor, the Media Ratings Council (MRC) to
18 validate their metrics.¹² Other industry participants followed suit.

19 45. LinkedIn, by contrast, chose to continue self-auditing, a practice akin to "grading its
20 own homework."¹³

21
22 ¹¹ Barry Levine, *ANA calls for independent audits of ads in the 'walled gardens,'* MarTech (Mar.
23 17, 2017), <https://martech.org/ana-calls-independent-audits-ads-walled-gardens/>.

24 ¹² Jessica Goodfellow, *Facebook agrees to be audited by Media Rating Council following*
misreporting scandal, The Drum (Feb. 10, 2017) [https://www.thedrum.com/news/2017/02/10/](https://www.thedrum.com/news/2017/02/10/facebook-agrees-be-audited-media-rating-council-following-misreporting-scandal)
25 [facebook-agrees-be-audited-media-rating-council-following-misreporting-scandal](https://www.thedrum.com/news/2017/02/10/facebook-agrees-be-audited-media-rating-council-following-misreporting-scandal); Ronan
26 Shields, *Google bows to third-party verification demands with YouTube now open to Media*
Ratings Council audit, The Drum (Feb. 21, 2017), [https://www.thedrum.com/news/2017/02/21/](https://www.thedrum.com/news/2017/02/21/google-bows-third-party-verification-demands-with-youtube-now-open-media-ratings)
[google-bows-third-party-verification-demands-with-youtube-now-open-media-ratings](https://www.thedrum.com/news/2017/02/21/google-bows-third-party-verification-demands-with-youtube-now-open-media-ratings).

27 ¹³ Suzanne Vranica and Jack Marshall, *Facebook Overestimated Key Video Metric for Two Years*,

1 46. By refusing outside auditing, LinkedIn removed any incentive to ensure the
2 accuracy of its ad metrics. In fact, self-auditing created a perverse incentive to overlook
3 measurement errors that inflate metrics, since the platform would benefit from the higher revenue
4 generated by inflated metrics.

5 47. Further compounding this problem, unlike its competitors, LinkedIn did not and
6 does not provide an adequate or transparent process for obtaining billing adjustments due to non-
7 genuine engagement. Small businesses have been denied refunds at LinkedIn's sole discretion even
8 when presented with evidence of non-genuine engagement.

9 48. Because of LinkedIn's longstanding refusal to engage a third-party to audit the
10 accuracy of its ad metrics and its obstruction of any meaningful ability for its advertisers to validate
11 or challenge LinkedIn's metrics, it created an environment where inflated metrics would not only
12 go uncorrected but would also benefit LinkedIn. Inevitably, inflated metrics inflated the perceived
13 value of LinkedIn's platform, causing substantial harm to its advertisers.

14 **E. LinkedIn's metrics were inflated by non-genuine engagement.**

15 49. LinkedIn systematically inflated ad metrics in its favor, which enabled it to overstate
16 the quality of its audiences, the quality of its ad inventory, and the engagement from its audiences.
17 That, in turn, allowed LinkedIn to collect inflated prices from advertisers.

18 50. For instance, LinkedIn tracked user engagement with video advertisements in the
19 LinkedIn mobile app. One video metric was video "views," where a user watches a video for some
20 time on the LinkedIn feed. Another was video "view-through rates," or views divided by number
21 of impressions. Both of these video metrics directly affected the price advertisers will be charged
22 for placing a video ad on LinkedIn.

23 _____
24 Wall Street Journal (Sept. 22, 2016) (quoting Keith Weed, chief marketing officer of Unilever
25 that "tech companies that don't let third parties measure their platforms is equivalent to 'letting
26 them mark their own homework'."), [https://www.wsj.com/articles/facebook-overestimated-key-
27 video-metric-for-two-years-1474586951](https://www.wsj.com/articles/facebook-overestimated-key-video-metric-for-two-years-1474586951); John Herrman and Sapna Maheshwari, *Facebook
28 Apologizes for Overstating Video Metrics*, New York Times (Sept. 23, 2016) (quoting Omnicom
that "third-party verification is a fundamental requirement. Publishers should not 'grade their own
homework'."), [https://www.nytimes.com/2016/09/24/business/media/facebook-apologizes-for-
overstating-video-metrics.html](https://www.nytimes.com/2016/09/24/business/media/facebook-apologizes-for-overstating-video-metrics.html).

1 51. Because advertisers could not access raw data in LinkedIn’s closed system, they
2 were forced to rely on LinkedIn’s statements about when videos were viewed, for how long, and
3 whether those views were legitimate.

4 52. LinkedIn recently admitted that its video ad metrics were inflated, which inflated
5 the prices charged to video advertisers.¹⁴ LinkedIn counted video views from a user’s LinkedIn
6 app even when the user merely scrolled past the video and the video was only playing off screen.
7 In other words, advertisers were charged for a video “view” even when the user was not actually
8 viewing the ad’s content. The off-screen views also inflated the “view-through rates” calculated
9 by LinkedIn.

10 53. Common usage, industry practice, and LinkedIn’s own metrics definitions¹⁵ would
11 not count such activity as a view.

12 54. LinkedIn also admitted to overstating user impressions on Sponsored Content¹⁶ ad
13 campaigns, counting impressions where ads only appeared briefly on screen as users rotated their
14 phones or navigated to other parts of the LinkedIn app. That overstatement increased prices across
15 the board for impression-based advertisements. In other words, LinkedIn systematically inflated
16 the data that determines impression-based pricing in its own favor, and to advertisers’ detriment.

17 55. LinkedIn has admitted that these impression and video view ad metrics were inflated
18 for more than two years, with over 418,000 advertisers overcharged as a result.¹⁷

19 56. Advertisers had no way to know about LinkedIn’s inflated metrics until November
20 12, 2020, when LinkedIn admitted as much.

21 _____
22 ¹⁴ Sahil Patel, *LinkedIn Finds Measurement Errors That Inflated Video and Ad Metrics*, Wall St.
23 J. (Nov. 12, 2020), [https://www.wsj.com/articles/linkedin-finds-measurement-errors-that-inflated-
video-and-ad-metrics-11605228577](https://www.wsj.com/articles/linkedin-finds-measurement-errors-that-inflated-video-and-ad-metrics-11605228577).

24 ¹⁵ *Video Metrics in Campaign Manager – Definitions*, LinkedIn,
25 [https://www.linkedin.com/help/lms/answer/a426666/video-metrics-in-campaign-manager-
definitions?lang=en](https://www.linkedin.com/help/lms/answer/a426666/video-metrics-in-campaign-manager-definitions?lang=en) (last accessed Aug. 17, 2021).

26 ¹⁶ Sponsored Content is LinkedIn’s most popular ad format, and includes single-image ads, video
carousel image ads, video ads, single job ads, and event ads.

27 ¹⁷ Gyanda Sachdeva, *We discovered two measurement issues. Here’s how we’re making it right*,
28 LinkedIn Marketing Solutions Blog (Nov. 12, 2020), [https://business.linkedin.com/marketing-
solutions/blog/linkedin-news/2020/how-we-re-working-to-improve](https://business.linkedin.com/marketing-solutions/blog/linkedin-news/2020/how-we-re-working-to-improve).

1 57. Had LinkedIn used reasonable, industry-standard auditing measures, it would have
2 detected the impression and video view errors years earlier.

3 58. LinkedIn’s metric-inflation problem goes far beyond what it has publicly admitted.

4 59. LinkedIn also inflated its metrics by reporting as legitimate widespread activity from
5 fraudulent accounts, automated accounts, or accidental clicks.

6 60. LinkedIn was aware that many purported impressions, clicks, and other interactions
7 with ad content on its platform were not attributable to actual engaged users.

8 61. For example, LinkedIn was aware that there were numerous automated accounts
9 (often referred to as “bots”) and other fraudulent accounts on its platform. These fraudulent
10 accounts and bots increased the amount of “inventory” on LinkedIn (i.e., the number of impressions
11 available for any given advertisement) as well as the number of clicks, views, and other interactions
12 with ad content. Some bots are also designed to take further action after clicking on an ad (e.g.,
13 submitting a subsequent form on the destination page).

14 62. However, these impressions, clicks, views, and subsequent activity from fraudulent
15 accounts and bots were worthless to advertisers. LinkedIn was aware that these non-genuine
16 interactions with ad content were worthless, but it failed to take adequate preventative measures as
17 that would decrease its revenue and profits.

18 63. LinkedIn also knew that many users mistakenly clicked on ads, but then
19 immediately left the page after realizing their mistake. Because mistaken clicks and other
20 unintentional interactions with ad content drove up LinkedIn’s ad revenues, LinkedIn looked the
21 other way.

22 64. Investigations and studies conducted by digital marketing experts revealed that
23 LinkedIn’s metrics included extensive traffic generated by fraudulent accounts, bot traffic, and
24 unchecked misclicks, in excess of industry standards.¹⁸ By counting non-genuine engagement with
25 ad content as genuine, LinkedIn reported inaccurate ad metrics across its platform and
26

27 ¹⁸ RMG, *Why Your LinkedIn Marketing Campaign Isn’t Working*, YouTube (Aug. 24, 2020),
28 <https://www.youtube.com/watch?v=jKuyxgWuiRM>.

1 systematically overstated the quality of engagement with advertising on LinkedIn. These
2 misrepresented metrics allowed LinkedIn to collect inflated ad prices from advertisers.

3 65. For years, LinkedIn knew or was recklessly indifferent to fraudulent accounts and
4 misclicks overstating the quality of the audience, ad inventory, and audience engagement on its
5 platform. LinkedIn's refusal or failure to correct its misrepresented metrics in turn allowed it to
6 collect a higher price from advertisers.

7 66. Users paying premium prices for LinkedIn ads did not reasonably expect to be
8 charged for non-genuine engagement. Indeed, LinkedIn claimed that the use of bots or other
9 automated fraudulent methods to access the platform is a violation of LinkedIn's User Agreement.

10 67. Plaintiffs and the Class members were unaware and could not reasonably have been
11 aware until LinkedIn disclosed its metric inflation that non-genuine engagement caused them to
12 pay more for advertising campaigns on LinkedIn than they bargained for. Further, advertisers
13 generally had no way of knowing the amount of non-genuine engagement they were paying for, in
14 part because LinkedIn's closed system prevented them from verifying the legitimacy of LinkedIn's
15 reported metrics.

16 68. Instead of investing in the infrastructure required to ensure ad-metric accuracy years
17 earlier in line with industry practice, LinkedIn waited until November 2020 to announce that it
18 retained the Media Rating Council to "audit" its metrics. LinkedIn's sub-standard practices and
19 failure to "invest[] in improvements to [its] processes and systems"¹⁹ much earlier caused harm to
20 all advertisers placing ads on its platform.

21 **F. Inflated metrics inflated LinkedIn ad prices.**

22 69. LinkedIn's failure to properly audit its metrics and validate activity on its platform
23 resulted in two distinct types of overcharges to advertisers: Transaction-Specific Overcharges and
24 Platform-Based Overcharges.

25 70. Transaction-Specific Overcharges occurred when advertisers were charged for
26 impressions, views, or clicks that should not have been charged. Such overcharges resulted from

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28 ¹⁹ Sachdeva, *supra* note 17.

1 the video-view and impression measurement errors identified above, and from the rampant
2 automated, fraudulent, accidental, or mistaken activity that went undetected by advertisers on
3 LinkedIn's platform.

4 71. In contrast to these Transaction-Specific Overcharges, Platform-Based Overcharges
5 resulted from the effect of inflated LinkedIn ad metrics on aggregate demand across the platform,
6 and with it, the prices charged across the platform. Platform-Based Overcharges occurred as part
7 of every transaction on LinkedIn because of the artificially inflated demand at all stages of the ad-
8 purchasing process.

9 72. Specifically, LinkedIn's inflated metrics first artificially increased demand as
10 advertisers prepared their campaigns. Throughout the process of setting up a campaign, LinkedIn
11 displayed forecasted campaign results, which included the target audience size, forecasted spend,
12 and forecasted key campaign metrics. Because LinkedIn calculated forecasted results based on
13 simulated ad auctions, considering similar LinkedIn campaigns and advertisers, the inflated metrics
14 in the campaigns used to generate the forecasted results in turn inflated the forecasted results.

15 73. Advertisers relied on these forecasted results while making decisions about how to
16 set up their campaigns, how to bid, and how much to bid. LinkedIn's overstatement of the
17 forecasted metrics artificially inflated advertisers' willingness to pay the Rates bid upon. Higher
18 forecasted results drew higher bids, and artificially high forecasted results drew artificially high
19 bids.

20 74. LinkedIn also overstated metrics after campaigns were launched, further inflating
21 demand for future campaigns. After advertisers launched campaigns, the metrics associated with
22 the campaigns were displayed on the home pages of the advertisers' campaign manager account,
23 meaning that advertisers immediately observed these metrics every time they access their ad
24 accounts. Because LinkedIn overstated performance metrics and presents those metrics to
25 advertisers every time they logged in to Campaign Manager, advertisers' willingness to pay for
26 subsequent campaigns was inflated.

27 75. Because of the repeated and pervasive inflation of metrics presented, all advertisers
28 competing in LinkedIn's second price ad auctions were willing to pay more than they otherwise

1 would have if their forecasted and reported campaign metrics had not been inflated. As a result,
2 across auctions, the second prices were higher than they otherwise would have been, and the
3 “winning” advertisers paid artificially inflated prices.

4 76. Thus, not only did rampant non-genuine engagement on LinkedIn’s network result
5 in Transaction-Specific Overcharges for particular instances of non-genuine activity, LinkedIn’s
6 years of falsely reporting ad metrics at each stage of the advertising process led to artificially
7 inflated demand, and, with it, Platform-Based Overcharges on every advertising purchase.

8 **G. LinkedIn’s inflated metrics harmed the public at large.**

9 77. The harm caused by LinkedIn’s misconduct was not limited to Transaction-Specific
10 Overcharges and Platform-Based Overcharges. It also had consequences that substantially harmed
11 the public.

12 78. The majority of LinkedIn advertisers are small businesses, which allocate a
13 substantial portion of their budgets to marketing and advertising. By charging inflated advertising
14 costs, LinkedIn left advertisers with less money to spend on other aspects of their businesses,
15 including the content and quality of their ads, which diminished LinkedIn users’ experience on the
16 platform, and their product and service offerings, which diminished overall consumer welfare.

17 79. Many of LinkedIn’s advertisers, including Plaintiff TopDevz, ran LinkedIn ads as
18 part of their recruiting efforts. By overstating metrics and charging for non-genuine engagement,
19 LinkedIn wasted advertisers’ budgets and impeded those advertisers’ ability to hire for open
20 positions and frustrated workers’ ability to apply for open jobs. Those effects were exacerbated
21 throughout 2020, as the COVID-19 pandemic led to both skyrocketing unemployment *and* staffing
22 shortages nationwide.

23 80. LinkedIn’s overcharges also caused public harm by interfering with the work of
24 social-justice focused organizations, including both nonprofits and for-profit organizations like
25 Noirefy, which use LinkedIn as a tool for addressing social inequities.

ALLEGATIONS SPECIFIC TO TOPDEVZ

A. TopDevz relied on LinkedIn’s inflated metrics while purchasing ads.

81. TopDevz is a small-business team of software developers, designers, project managers, and quality assurance testers that develops custom software solutions for sophisticated businesses.

82. TopDevz typically has approximately 150 full- and part-time workers.

83. TopDevz does not have an in-house ad analytics department or expert.

84. According to LinkedIn’s own website, TopDevz is a small business.²⁰

85. In March 2019, TopDevz ran a Sponsored Content Ad Campaign titled “TopDevz People – 51k.” While creating and launching the “TopDevz People – 51k” Campaign, TopDevz CEO Ashkan Rajae viewed and relied on forecasted spend, impressions, VTR, and video views.

86. In March 2019, TopDevz also ran a Sponsored Content Ad Campaign titled “1 – Min Intro – Video View 860k 11-10,000.” While creating, launching, and operating the 1 – Min Intro – Video View 860k 11-10,000” Campaign, Mr. Rajae viewed and relied on forecasted and actual spend, impressions, VTR, and video views.

87. In March 2019, TopDevz also ran a Sponsored Content Ad Campaign titled “Lead generation – Auto Bid – 3.1MM Form Fill 11-10,000.” While creating, launching, and operating the “Lead generation – Auto Bid – 3.1MM Form Fill 11-10,000” Campaign, Mr. Rajae viewed and relied on forecasted and actual spend, impressions, CTR, leads, and clicks.

88. In March 2019, TopDevz also ran a Sponsored Content Ad Campaign titled “Lead generation – 78k CRM list.” While creating, launching, and operating the “Lead generation – 78K CRM List” Campaign, Mr. Rajae viewed and relied on the forecasted and actual metrics for the campaign, in addition to performance metrics for that campaign and the previously launched campaigns.

²⁰ *Create a LinkedIn Page*, LinkedIn, <https://www.linkedin.com/company/setup/new/> (last accessed Aug. 17, 2021).

89. Before launching its first campaigns, TopDevz was required to set up payment credentials. When Mr. Rajae did so on TopDevz's behalf, LinkedIn promised that for these campaigns and any subsequent campaigns, TopDevz would only be charged for clicks, views, or impressions by "someone." When it purchased ads for these campaigns and subsequent campaigns, TopDevz relied on LinkedIn's representation that it would only be charged for clicks, views, or impressions by "someone."

90. In March 2019, TopDevz also ran a Sponsored Content Ad Campaign titled "Website visits Ad – 740k." Before creating that campaign, Mr. Rajae evaluated the performance metrics for his prior campaigns, which he viewed in his campaign manager account and appeared substantially similar to the following images:

Campaign Name	Key Results	Cost Per Result	Impressions	Clicks	Average CTR	Bid
29 campaigns	-	-	10,237	61	0.6%	-
Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 · Sponsored Content	1 Leads	\$953.54	7,984	54	0.68%	Manual Bid: \$300.00
1 - Min Intro - Video View 860K 11-10.00 ID: 148092204 · Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery
TopDevz People -51K ID: 148092084 · Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery
Lead generation - 78K CRM List ID: 148092444 · Sponsored Content	0 Leads	-	517	6	1.16%	Manual Bid: \$50.00

Campaign Name	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead	Event Registrations
29 campaigns	\$127.72	\$21.43	0	-	1	\$1,039.73	0
Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 · Sponsored Content	\$119.43	\$17.66	0	-	1	\$953.54	0
1 - Min Intro - Video View 860K 11-10.00 ID: 148092204 · Sponsored Content	\$85.92	\$136.78	0	-	0	-	0
TopDevz People -51K ID: 148092084 · Sponsored Content	\$909.65	-	0	-	0	-	0
Lead generation - 78K CRM List ID: 148092444 · Sponsored Content	\$166.71	\$14.37	0	-	0	-	0

91. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior campaigns when deciding whether to launch a subsequent campaign. While creating, launching, and operating the "Website visits Ad – 740K" Campaign, Mr. Rajae also viewed and relied on the forecasted spend, impressions, CTR, and clicks for that campaign

92. In April 2020, TopDevz ran a Sponsored Content Ad Campaign titled "Lead generation – Apr 25, 2020." Before creating that campaign, Mr. Rajae evaluated the performance

1 metrics for his prior campaigns, which he viewed in his campaign manager account and appeared
 2 substantially similar to the following images:

Campaign Name ↕	Key Results ↕	Cost Per Result ↕	Impressions ↕	Clicks ↕	Average CTR ↕	Bid ↕
29 campaigns	-	-	188,868	1,392	0.74%	-
Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 · Sponsored Content	19 Leads	\$1,094.86	145,487	1,072	0.74%	Manual Bid: \$300.00
Lead generation - 78K CRM List ID: 148092444 · Sponsored Content	8 Leads	\$609.22	22,169	207	0.93%	Manual Bid: \$50.00
Website visits Ad - 740K ID: 148242614 · Sponsored Content Legacy	-	-	18,229	95	0.52%	Maximum Delivery
Lead generation - Apr 25, 2020 ID: 159575154 · Sponsored Content	0 Leads	-	1,247	17	1.36%	Maximum Delivery
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 · Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery
TopDevz People -51K ID: 148092084 · Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery

Campaign Name ↕	Average CPM ↕	Average CPC ↕	Conversions ↕	Cost Per Conversion ↕	Leads ↕	Cost Per Lead ↕
<input type="checkbox"/> 29 campaigns	\$144.93	\$19.66	0	-	27	\$960.76
<input type="checkbox"/> Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 · Sponsored Content	\$142.98	\$19.41	0	-	19	\$1,094.86
<input type="checkbox"/> Lead generation - 78K CRM List ID: 148092444 · Sponsored Content	\$219.84	\$23.54	0	-	8	\$609.22
<input type="checkbox"/> Website visits Ad - 740K ID: 148242614 · Sponsored Content Legacy	\$63.87	\$12.26	0	-	0	-
<input type="checkbox"/> Lead generation - Apr 25, 2020 ID: 159575154 · Sponsored Content	\$212.17	\$15.56	0	-	0	-
<input type="checkbox"/> 1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 · Sponsored Content	\$85.92	\$136.78	0	-	0	-
<input type="checkbox"/> TopDevz People -51K ID: 148092084 · Sponsored Content	\$909.65	-	0	-	0	-

19 93. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior
 20 campaigns when deciding whether to launch a subsequent campaign. While creating, launching,
 21 and operating the “Lead generation – Apr 25, 2020” Campaign, Ashkan Rajae also viewed and
 22 relied on the forecasted spend, impressions, CTR, leads, and clicks, in addition to performance
 23 metrics for that campaign and the previously launched campaigns.

24 94. In August 2020, TopDevz ran a Sponsored Content Ad Campaign titled “Grant
 25 Promo.” A third party was responsible for the campaign, including assessment of the forecasted
 26 metrics.

27 95. In August 2020, TopDevz ran a Sponsored Content Ad Campaign titled “Website
 28 visits – Aug 20, 2020.” Before creating that campaign, Mr. Rajae evaluated the performance

1 metrics for his prior campaigns, which he viewed in his campaign manager account and appeared
 2 substantially similar to the following images:

Campaign Name ↕	Key Results ↕	Cost Per Result ↕	Impressions ↕	Clicks ↕	Average CTR ↕	Bid ↕
29 campaigns	-	-	196,811	1,453	0.74%	-
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	19 Leads	\$1,094.86	145,487	1,072	0.74%	Manual Bid: \$300.00
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	8 Leads	\$609.22	22,169	207	0.93%	Manual Bid: \$50.00
Website visits Ad - 740K ID: 148242614 - Sponsored Content Legacy	-	-	18,229	95	0.52%	Maximum Delivery
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	0 Leads	-	8,324	76	0.91%	Maximum Delivery
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery
TopDevz People -51K ID: 148092084 - Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery
Grant Promo	2					
Campaign Name ↕	Average CPM ↕	Average CPC ↕	Conversions ↕	Cost Per Conversion ↕	Leads ↕	Cost Per Lead ↕
29 campaigns	\$141.75	\$19.20	0	-	27	\$979.83
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	\$142.98	\$19.41	0	-	19	\$1,094.86
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	\$219.84	\$23.54	0	-	8	\$609.22
Website visits Ad - 740K ID: 148242614 - Sponsored Content Legacy	\$63.87	\$12.26	0	-	0	-
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	\$93.62	\$10.25	0	-	0	-
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	\$85.92	\$136.78	0	-	0	-
TopDevz People -51K ID: 148092084 - Sponsored Content	\$909.65	-	0	-	0	-
Grant Promo ID: 154279126 - Sponsored Content	\$12.18	\$5.00	0	-	0	-

19 96. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior
 20 campaigns when deciding whether to launch a subsequent campaign. While creating, launching,
 21 and operating the “Website Visits – Aug 20, 2020” Campaign, Ashkan Rajae also viewed and
 22 relied on the forecasted spend, impressions, CTR, clicks, and landing page clicks for the campaign,
 23 in addition to performance metrics for that campaign and the previously launched campaigns.

24 97. In September 2020, TopDevz ran a Sponsored Content Ad Campaigns titled “1-Ruff
 25 Commercial – Sept 14-21,” “2-We Can Do It In House,” “Website Visits – 1 – Ruff,” and
 26 “TopDevz.com – Website visits – 18-31 and Feel Great.” Before creating those campaigns, Mr.
 27 Rajae evaluated the performance metrics for his prior campaigns, which he viewed in his
 28 campaign manager account and appeared substantially similar to the following images:

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Campaign Name	Key Results	Cost Per Result	Impressions	Clicks	Average CTR	Bid
29 campaigns	-	-	215,768	1,529	0.71%	-
Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 · Sponsored Content	19 Leads	\$1,094.86	145,487	1,072	0.74%	Manual Bid: \$300.00
Lead generation - 78K CRM List ID: 148092444 · Sponsored Content	8 Leads	\$609.22	22,169	207	0.93%	Manual Bid: \$50.00
Website visits Ad - 740K ID: 148242614 · Sponsored Content Legacy	-	-	18,229	95	0.52%	Maximum Delivery
Lead generation - Apr 25, 2020 ID: 159575154 · Sponsored Content	0 Leads	-	8,324	76	0.91%	Maximum Delivery
Grant Promo ID: 154279126 · Sponsored Content	74 Website Visits	\$5.13	18,889	74	0.39%	Target Cost: \$6.05
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 · Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery
TopDevz People -51K ID: 148092084 · Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery
1-Ruff Commercial - Sept 14-21 ID: 155025186 · Sponsored Content	180 Views	\$0.29	348	2	0.57%	Target Cost: \$0.18
Website visits - Aug 20, 2020	7	-	-	-	-	-
Campaign Name	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead
29 campaigns	\$131.32	\$18.53	0	-	27	\$979.83
Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 · Sponsored Content	\$142.98	\$19.41	0	-	19	\$1,094.86
Lead generation - 78K CRM List ID: 148092444 · Sponsored Content	\$219.84	\$23.54	0	-	8	\$609.22
Website visits Ad - 740K ID: 148242614 · Sponsored Content Legacy	\$63.87	\$12.26	0	-	0	-
Lead generation - Apr 25, 2020 ID: 159575154 · Sponsored Content	\$93.62	\$10.25	0	-	0	-
Grant Promo ID: 154279126 · Sponsored Content	\$20.11	\$5.13	0	-	0	-
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 · Sponsored Content	\$85.92	\$136.78	0	-	0	-
TopDevz People -51K ID: 148092084 · Sponsored Content	\$909.65	-	0	-	0	-
1-Ruff Commercial - Sept 14-21 ID: 155025186 · Sponsored Content	\$151.84	\$26.42	0	-	0	-
Website visits - Aug 20, 2020 ID: 154279476 · Sponsored Content	\$23.38	\$6.85	0	-	0	-

98. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior campaigns when deciding whether to launch subsequent campaigns. While creating, launching, and operating the “1-Ruff Commercial – Sept 14-21” Campaign, Mr. Rajae also viewed and relied on forecasted spend, impressions, CTR, video views, and target cost, in addition to performance metrics for that campaign and the previously launched campaigns.

99. While creating, launching, and operating the “2-We Can Do It In House” Campaign, Mr. Rajae also viewed and relied on the forecasted spend, CTR, clicks, and landing page clicks

1 for the campaign, in addition to performance metrics for that campaign and the previously launched
2 campaigns.

3 100. While creating, launching, and operating the “Website Visits – 1- Ruff” Campaign,
4 Mr. Rajae also viewed and relied on the forecasted, impressions, CTR, clicks, landing page clicks,
5 and target cost for the campaign, in addition to performance metrics for that campaign and the
6 previously launched campaigns.

7 101. While creating, launching, and operating the “TopDevz.com – Website visits – 18-
8 31 and Feel Great” Campaign, Mr. Rajae also viewed and relied on the forecasted spend,
9 impressions, CTR, clicks, landing page clicks, and target cost for the campaign, in addition to
10 performance metrics for that campaign and the previously launched campaigns.

11 102. In September 2020, Plaintiff also ran a Sponsored Content Ad Campaign titled
12 “Reach – Brand awareness – Build In-House.” Before creating this campaign, Mr. Rajae
13 evaluated the performance metrics for his prior campaigns, which he viewed in his campaign
14 manager account and appeared substantially similar to the following images:

Campaign Name	Key Results	Cost Per Result	Impressions	Clicks	Average CTR	Bid	Average CPM
29 campaigns	-	-	231,581	1,569	0.68%	-	\$123.66
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	19 Leads	\$1,094.86	145,487	1,072	0.74%	Manual Bid: \$300.00	\$142.98
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	8 Leads	\$609.22	22,169	207	0.93%	Manual Bid: \$50.00	\$219.84
Website visits Ad - 740K ID: 148242614 - Sponsored Content Legacy	-	-	16,229	95	0.52%	Maximum Delivery	\$63.87
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	0 Leads	-	8,324	76	0.91%	Maximum Delivery	\$93.62
Grant Promo ID: 154279126 - Sponsored Content	113 Website Visits	\$5.87	33,738	113	0.33%	Target Cost: \$6.05	\$19.68
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery	\$85.92
TopDevz People - 51K ID: 148092084 - Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery	\$909.65
1-Ruff Commercial - Sept 14-21 ID: 155025186 - Sponsored Content	234 Views	\$0.26	463	2	0.43%	Target Cost: \$0.18	\$130.13
Website visits - Aug 20, 2020 ID: 154279476 - Sponsored Content	2 Website Visits	\$6.85	586	2	0.34%	Manual Bid: \$6.85	\$23.38
Website Visits - 1- Ruff ID: 155062916 - Sponsored Content	1 Website Visits	\$12.63	808	1	0.12%	Target Cost: \$10.00	\$15.63

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Campaign Name	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead
29 campaigns	\$123.66	\$18.25	0	-	27	\$979.83
Lead generation -Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	\$142.98	\$19.41	0	-	19	\$1,094.86
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	\$219.84	\$23.54	0	-	8	\$609.22
Website visits Ad - 740K ID: 148242614 - Sponsored Content Legacy	\$63.87	\$12.26	0	-	0	-
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	\$93.62	\$10.25	0	-	0	-
Grant Promo ID: 154279126 - Sponsored Content	\$19.68	\$5.87	0	-	0	-
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	\$85.92	\$136.78	0	-	0	-
TopDevz People -51K ID: 148092084 - Sponsored Content	\$909.65	-	0	-	0	-
1-Ruff Commercial - Sept 14-21 ID: 155025186 - Sponsored Content	\$130.13	\$30.12	0	-	0	-
Website visits - Aug 20, 2020 ID: 154279476 - Sponsored Content	\$23.38	\$6.85	0	-	0	-
Website Visits - 1- Ruff ID: 155082916 - Sponsored Content	\$15.63	\$12.63	0	-	0	-

103. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior campaigns when deciding whether to launch subsequent campaigns. While creating, launching, and operating the “Reach – Brand awareness – Build In-House” Campaign, Mr. Rajae also viewed and relied on the forecasted spend, impressions, CTR, CPM, and clicks, in addition to performance metrics for that campaign and the previously launched campaigns.

104. In September 2020, Plaintiff also ran a Sponsored Messaging Ad Campaign titled “Reach – Message.” Before creating that campaign, Mr. Rajae evaluated the performance metrics for his prior campaigns, which he viewed in his campaign manager account and appeared substantially similar to the following images:

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Campaign Name	Key Results	Cost Per Result	Impressions	Clicks	Average CTR	Bid	Average CPM	Cost Per Lead				
29 campaigns												
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	19 Leads	\$1,094.86	145,467	1,072	0.74%	Manual Bid: \$300.00	\$142.98	\$1,094.86				
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	8 Leads	\$609.22	22,169	207	0.93%	Manual Bid: \$50.00	\$219.84	\$609.22				
Website visits Ad - 740K ID: 148242614 - Sponsored Content <i>Legacy</i>	-	-	18,229	95	0.52%	Maximum Delivery	\$63.87	-				
Grant Promo ID: 154279126 - Sponsored Content	135 Website Visits	\$6.15	44,631	135	0.3%	Target Cost: \$8.05	\$18.54	-				
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	0 Leads	-	8,324	78	0.91%	Maximum Delivery	\$93.62	-				
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery	\$85.92	-				
TopDevz People - 51K ID: 148092084 - Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery	\$909.65	-				
Website Visits - 1- Ruff ID: 15502916 - Sponsored Content	9 Website Visits	\$12.38	4,829	9	0.19%	Target Cost: \$10.00	\$23.07	\$12.38				
1-Ruff Commercial - Sept 14-21 ID: 155025186 - Sponsored Content	234 Views	\$0.26	463	2	0.43%	Target Cost: \$0.18	\$130.13	\$0.26				
Website visits - Aug 20, 2020 ID: 154279476 - Sponsored Content	2 Website Visits	\$6.85	586	2	0.34%	Manual Bid: \$6.85	\$23.38	\$6.85				
Campaign Name	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead						
29 campaigns							\$117.03	\$18.07	0	-	27	\$979.83
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	\$142.98	\$19.41	0	-	19	\$1,094.86						
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	\$219.84	\$23.54	0	-	8	\$609.22						
Website visits Ad - 740K ID: 148242614 - Sponsored Content <i>Legacy</i>	\$63.87	\$12.26	0	-	0	-						
Grant Promo ID: 154279126 - Sponsored Content	\$18.54	\$6.13	0	-	0	-						
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	\$93.62	\$10.25	0	-	0	-						
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	\$85.92	\$136.78	0	-	0	-						
TopDevz People - 51K ID: 148092084 - Sponsored Content	\$909.65	-	0	-	0	-						
Website Visits - 1- Ruff ID: 15502916 - Sponsored Content	\$23.07	\$12.38	0	-	0	-						
1-Ruff Commercial - Sept 14-21 ID: 155025186 - Sponsored Content	\$130.13	\$30.12	0	-	0	-						
Website visits - Aug 20, 2020 ID: 154279476 - Sponsored Content	\$23.38	\$6.85	0	-	0	-						
Reach - Brand awareness - Build In-House ID: 155294286 - Sponsored Content	\$21.49	\$11.37	0	-	0	-						

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105. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior campaigns when deciding whether to launch subsequent campaigns. While creating, launching, and operating the “Reach – Message” Campaign, Mr. Rajae viewed and relied on the forecasted spend and sends for the campaign, in addition to performance metrics for that campaign and the previously launched campaigns.

106. In October 2020, TopDevz ran a Sponsored Content Ad Campaign titled “Reach – Brand Awareness – We Can Build It In House – Custom Audience.” Before creating that campaign,

1 Mr. Rajae evaluated the performance metrics for his prior campaigns, which he viewed in his
 2 campaign manager account and appeared substantially similar to the following images:

Campaign Name	Key Results	Cost Per Result	Impressions	Clicks	Average CTR	Bid	Average CPM
29 campaigns	-	-	312,620	2,172	0.69%	-	\$102.55
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	19 Leads	\$1,094.86	145,487	1,072	0.74%	Manual Bid: \$300.00	\$142.98
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	8 Leads	\$609.22	22,169	207	0.93%	Manual Bid: \$50.00	\$219.84
Reach - Brand awareness - Build In-House ID: 155294286 - Sponsored Content	4,857 Reach	\$461.44	26,736	84	0.31%	Manual Bid: \$100.00	\$83.83
Grant Promo ID: 154279126 - Sponsored Content	211 Website Visits	\$6.53	79,615	211	0.27%	Target Cost: \$6.05	\$17.30
Website visits Ad - 740K Legacy ID: 148242614 - Sponsored Content	-	-	18,229	95	0.52%	Maximum Delivery	\$63.87
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	0 Leads	-	8,324	76	0.91%	Maximum Delivery	\$93.62
Reach - Message ID: 155497676 - Sponsored Messaging	7 Website Visits	\$40.29	849	406	47.82%	Manual Bid: \$0.30	\$332.21
Website Visits - 1- Ruff ID: 155082916 - Sponsored Content	16 Website Visits	\$12.36	8,373	16	0.19%	Target Cost: \$10.00	\$23.62
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	540 Views	\$0.25	1,592	1	0.06%	Maximum Delivery	\$85.92
TopDevz People -51K ID: 148092084 - Sponsored Content	65 Views	\$2.02	144	0	0%	Maximum Delivery	\$909.65
1-Ruff Commercial - Sept 14-21 ID: 155025186 - Sponsored Content	234 Views	\$0.26	463	2	0.43%	Target Cost: \$0.18	\$130.13
Website visits - Aug 20, 2020 ID: 154279476 - Sponsored Content	2 Website Visits	\$6.85	586	2	0.34%	Manual Bid: \$6.85	\$23.38

Campaign Name	R	Bid	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead
29 campaigns	-	-	\$102.55	\$14.76	0	-	27	\$979.83
Lead generation - Auto Bid - 3.1MM Form Fill 11-10,000 ID: 148092314 - Sponsored Content	***	Manual Bid: \$300.00	\$142.98	\$19.41	0	-	19	\$1,094.86
Lead generation - 78K CRM List ID: 148092444 - Sponsored Content	***	Manual Bid: \$50.00	\$219.84	\$23.54	0	-	8	\$609.22
Reach - Brand awareness - Build In-House ID: 155294286 - Sponsored Content	***	Manual Bid: \$100.00	\$83.83	\$26.60	0	-	0	-
Grant Promo ID: 154279126 - Sponsored Content	***	Target Cost: \$6.05	\$17.30	\$6.53	0	-	0	-
Website visits Ad - 740K Legacy ID: 148242614 - Sponsored Content	***	Maximum Delivery	\$63.87	\$12.26	0	-	0	-
Lead generation - Apr 25, 2020 ID: 159575154 - Sponsored Content	***	Maximum Delivery	\$93.62	\$10.25	0	-	0	-
Reach - Message ID: 155497676 - Sponsored Messaging	***	Manual Bid: \$0.30	\$332.21	\$0.69	0	-	0	-
Website Visits - 1- Ruff ID: 155082916 - Sponsored Content	***	Target Cost: \$10.00	\$23.62	\$12.36	0	-	0	-
1 - Min Intro - Video View 860K 11-10,000 ID: 148092204 - Sponsored Content	***	Maximum Delivery	\$85.92	\$136.78	0	-	0	-
TopDevz People -51K ID: 148092084 - Sponsored Content	***	Maximum Delivery	\$909.65	-	0	-	0	-
1-Ruff Commercial - Sept 14-21 ID: 155025186 - Sponsored Content	***	Target Cost: \$0.18	\$130.13	\$30.12	0	-	0	-
Website visits - Aug 20, 2020 ID: 154279476 - Sponsored Content	***	Manual Bid: \$6.85	\$23.38	\$6.85	0	-	0	-

107. Mr. Rajae reasonably relied on the accuracy of the metrics associated with his prior
 campaigns when deciding whether to launch subsequent campaigns. While creating, launching,
 and operating the “Reach – Brand Awareness – We Can Build It In House – Custom Audience”
 Campaign, Mr. Rajae viewed and relied on the forecasted spend, impressions, CTR, CPM, and
 clicks for the campaign, in addition to performance metrics for that campaign and the previously
 launched campaigns.

1 **B. TopDevz was subject to Transaction-Specific and Platform-Based Overcharges.**

2 108. LinkedIn has admitted to TopDevz that it “may have over-reported some []
3 Sponsored Content metrics for impression and video views.”²¹

4 109. Prior to LinkedIn’s disclosure of its measurement errors, TopDevz did not know and
5 had no reason to know that LinkedIn’s ad metrics were inflated.

6 110. TopDevz relied on LinkedIn’s forecasted metrics and its representation that it would
7 only be charged when “someone” engaged with its advertisements and would not have paid the
8 premium prices charged had it known that LinkedIn’s advertising metrics were inflated.

9 111. Because of the rampant non-genuine engagement on LinkedIn’s platform, TopDevz
10 was subject to Transaction-Specific Overcharges when it was charged for engagement that was
11 automated, fraudulent, mistaken, or miscalculated.

12 112. TopDevz was also subject to Platform-Based Overcharges, as its winning bids—i.e.,
13 the second highest competing bid plus \$0.01—would have been lower but for LinkedIn’s pervasive
14 overstatement of its ad metrics.

15 **C. LinkedIn’s overcharges injured TopDevz and the public.**

16 113. LinkedIn’s misrepresented ad metrics prevented TopDevz from accurately
17 evaluating the success of its ad campaigns and making informed business decisions about its digital
18 advertising strategy.

19 114. By paying inflated prices for advertisements on LinkedIn, TopDevz had less money
20 to spend on other aspects of its business.

21 115. After learning about LinkedIn’s metrics inflation, TopDevz reduced its LinkedIn
22 advertising and substantially reduced the maximum amount it would be willing to bid on LinkedIn
23 advertisements. TopDevz would like to purchase more LinkedIn ads in the future based upon
24 accurate metrics and with industry-standard auditing and anti-fraud measures in place.

25
26
27
28 ²¹ See LinkedIn, *Transactional Email Message to Ashkan Rajaei (CEO of TopDevz)*, attached as Exhibit C.

ALLEGATIONS SPECIFIC TO NOIREFY

A. Noirefy relied on LinkedIn’s inflated metrics while purchasing ads.

116. Noirefy is a diversity recruiting startup that connects underrepresented professionals with career opportunities at high-growth companies.

117. Noirefy has two full-time workers and does not have an in-house ad analytics department or specialist.

118. According to LinkedIn’s own website, Noirefy is a small business.²²

119. In September 2018, Noirefy launched a Sponsored Content ad campaign titled “Candidate.” While creating and launching the “Candidate” Ad Campaign in August and September 2018, Noirefy’s CEO Shaniqua Davis viewed and relied on forecasted metrics for the campaign, including forecasted clicks, impressions, CTR, and video views.

120. After setting up the Candidate campaign, Noirefy was required to set up payment credentials. When Ms. Davis did so on Noirefy’s behalf, LinkedIn promised that for the Candidate campaign and any subsequent campaigns, Noirefy would only be charged for clicks, views, or impressions by “someone.” When it purchased ads for the Candidate campaign and subsequent campaigns, Noirefy relied on LinkedIn’s representation that it would only be charged for clicks, views, or impressions by “someone.”

121. In August 2020, Noirefy ran a Sponsored Content Ad Campaign titled “Website visits – Aug 18, 2020.” Before creating that campaign, Ms. Davis evaluated the performance metrics for her prior campaign, which she viewed in her campaign manager account and appeared substantially similar to the following images:

Campaign Name	Key Results	Cost Per Result	Impressions	Clicks	Average CTR	Bid
1 selected campaigns	-	-	1,415	8	0.57%	-
Candidate ID: 143075414 · Sponsored Content	484 Views	\$0.21	1,415	8	0.57%	Maximum Delivery

Campaign Name	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead
1 selected campaigns	\$70.67	\$12.50	0	-	0	-
Candidate ID: 143075414 · Sponsored Content	\$70.67	\$12.50	0	-	0	-

²² Create a LinkedIn Page, LinkedIn, <https://www.linkedin.com/company/setup/new/> (last accessed Aug. 17, 2021).

1 122. Ms. Davis reasonably relied on the accuracy of the metrics associated with her prior
2 campaign when deciding whether to launch a subsequent campaign. While creating and launching
3 the “Website visits – aug 18, 2020” ad campaign, Ms. Davis also viewed and relied on forecasted
4 metrics for the campaign, including forecasted clicks, impressions, and CTR.

5 123. In September 2020, Noirefy ran a Sponsored Content ad campaign titled “Website
6 visits – Sep 1, 2020.” Before creating that campaign, Ms. Davis evaluated the performance metrics
7 for her prior campaigns, which she viewed in her campaign manager account and appeared
8 substantially similar to the following images:

Campaign Name ↕	Key Results ↕	Cost Per Result ↕	Impressions ↕	Clicks ↕	Average CTR ↕	Bid ↕
2 selected campaigns						
Candidate ID: 143075414 · Sponsored Content ***	484 Views	\$0.21	1,415	8	0.57%	Maximum Delivery
Website visits - Aug 18, 2020 ID: 154182426 · Sponsored Content ***	7 Website Visits	\$5.07	258	7	2.71%	Maximum Delivery
Campaign Name ↕	Average CPM ↕	Average CPC ↕	Conversions ↕	Cost Per Conversion ↕	Leads ↕	Cost Per Lead ↕
2 selected campaigns						
Candidate ID: 143075414 · Sponsored Content ***	\$70.67	\$12.50	0	-	0	-
Website visits - Aug 18, 2020 ID: 154182426 · Sponsored Content ***	\$137.56	\$5.07	0	-	0	-

15 124. Ms. Davis reasonably relied on the accuracy of the metrics associated with her prior
16 campaigns when deciding whether to launch a subsequent campaign. While creating and launching
17 the “Website visits – Sept 1, 2020” ad campaign, Ms. Davis also viewed and relied on forecasted
18 metrics for that campaign, including forecasted clicks, impressions, and CTR.

19 125. In November 2020, Noirefy ran a Sponsored Content ad campaign titled “Website
20 visits – Nov 2, 2020.” Before creating that campaign, Ms. Davis evaluated the performance metrics
21 for her prior campaigns, which she viewed in her campaign manager account and appeared
22 substantially similar to the following images:

Campaign Name ↕	Key Results ↕	Cost Per Result ↕	Impressions ↕	Clicks ↕	Average CTR ↕	Bid ↕
3 selected campaigns						
Website visits - Sep 1, 2020 ID: 167157824 · Sponsored Content ***	103 Website Visits	\$3.01	14,654	103	0.7%	Maximum Delivery
Candidate ID: 143075414 · Sponsored Content ***	484 Views	\$0.21	1,415	8	0.57%	Maximum Delivery
Website visits - Aug 18, 2020 ID: 154182426 · Sponsored Content ***	7 Website Visits	\$5.07	258	7	2.71%	Maximum Delivery

Campaign Name	Average CPM	Average CPC	Conversions	Cost Per Conversion	Leads	Cost Per Lead
3 selected campaigns	\$27.29	\$3.78	10	\$31.00	0	-
Website visits - Sep 1, 2020 ID: 167157824 · Sponsored Content	\$21.15	\$3.01	10	\$31.00	0	-
Candidate ID: 143075414 · Sponsored Content	\$70.67	\$12.50	0	-	0	-
Website visits - Aug 18, 2020 ID: 154182426 · Sponsored Content	\$137.56	\$5.07	0	-	0	-

126. Ms. Davis reasonably relied on the accuracy of the metrics associated with her prior campaigns when deciding whether to launch a subsequent campaign. While creating and launching the “Website visits – Nov 2, 2020” ad campaign, Ms. Davis also viewed and relied on forecasted metrics for that campaign, including forecasted clicks, impressions, and CTR.

B. Noirefy was subject to Transaction-Specific and Platform-Based Overcharges.

127. LinkedIn has admitted to Noirefy that it “may have over-reported some [] Sponsored Content metrics for impression and video views.”²³

128. Prior to LinkedIn’s disclosure of its measurement errors, Noirefy did not know and had no reason to know that LinkedIn’s ad metrics were inflated.

129. Noirefy relied on LinkedIn’s forecasted metrics and its representation that it would only be charged when “someone” engaged with its advertisements and would not have paid the premium prices charged had it known that LinkedIn’s advertising metrics were inflated.

130. Because of the rampant non-genuine engagement on LinkedIn’s platform, Noirefy was subject to Transaction-Specific Overcharges when it was charged for engagement that was automated, fraudulent, mistaken, or miscalculated.

131. Noirefy was also subject to Platform-Based Overcharges, as its winning bids—i.e., the second highest competing bid plus \$0.01—would have been lower but for LinkedIn’s pervasive overstatement of its ad metrics.

²³ See LinkedIn, *Transactional Email Message to Shaniqua Davis (Noirefy CEO)*, attached as Exhibit D.

1 139. Although the precise number of Class members is unknown and can only be
2 determined through appropriate discovery, the proposed Class numbers at least in the hundreds of
3 thousands and is therefore so numerous that joinder of all members would be impracticable.

4 140. Questions of law and fact common to the putative Class predominate over questions
5 affecting only individual members. Those common questions include:

6 141. Whether LinkedIn's use of inaccurate, unaudited, and unverified ad metrics violated
7 California's False Advertising Law (Cal. Bus. & Prof Code § 17500);

8 a. Whether LinkedIn's use of inaccurate, unaudited, and unverified ad metrics was
9 likely to deceive members of the public and thus constituted a fraudulent
10 business practice under California's Unfair Competition Law (Cal. Bus. & Prof.
Code § 17200);

11 b. Whether LinkedIn's failure to properly audit and verify its ad metrics was
12 unethical, unscrupulous, or substantially injurious to ad purchasers and thus
13 constituted an unfair business practice under California's Unfair Competition
Law;

14 c. Whether LinkedIn negligently misrepresented its advertising metrics;

15 d. Whether LinkedIn breached its contractual duty to perform competently and
16 with reasonable care when it reported erroneous ad metrics and failed to
adequately audit and verify those metrics; and

17 e. Whether LinkedIn breached the implied covenant of good faith and fair dealing
18 when it reported erroneous ad metrics and failed to adequately audit and verify
those metrics; and, in the alternative to the questions above.

19 142. Plaintiffs are members of the putative Class. The claims asserted by the Plaintiffs
20 in this action are typical of the claims of the members of the putative Class, as the claims arise from
21 the same course of conduct by the Defendant and the relief sought is common.

22 143. Plaintiffs will fairly and adequately represent and protect the interests of the
23 members of the putative Class, as their interests are coincident with, not antagonistic to, the other
24 members of the Class.

25 144. Plaintiffs have retained counsel competent and experienced in both unfair
26 competition claims and class action litigation.

1 145. Certification of the Class is appropriate pursuant to Fed. R. Civ. P. 23(b)(3) because
 2 questions of law or fact common to the respective members of the Class predominate over questions
 3 of law or fact affecting only individual members. This predominance makes class litigation
 4 superior to any other method available for the fair and efficient adjudication of these claims
 5 including consistency of adjudications. Absent a class action it would be unlikely that many
 6 members of the Class would be able to protect their own interests because the cost of litigation
 7 through individual lawsuits might exceed the expected recovery.

8 146. A class action is a superior method for the adjudication of the controversy in that it
 9 will permit a large number of claims to be resolved in a single forum simultaneously, efficiently,
 10 and without the unnecessary hardship that would result from the prosecution of numerous
 11 individual actions and the duplication of discovery, effort, expense, and the burden of the courts
 12 that individual actions would create.

13 147. In the alternative, the Class should be certified under Rule 23(b)(2) because
 14 LinkedIn has acted or refused to act on grounds generally applicable to the proposed Class, thereby
 15 making appropriate final and injunctive relief with respect to the members of the proposed Class
 16 as a whole.

17 **FIRST CAUSE OF ACTION**
 18 **(On behalf of the Class)**
 19 **FALSE ADVERTISING LAW**
 20 **CAL. BUS. & PROF. CODE §§ 17500, *et seq***

21 148. Plaintiffs re-allege and incorporate by reference herein all the allegations contained
 22 above.

23 149. California’s False Advertising Law, Cal. Bus. & Prof. Code §§ 17500 *et seq.*
 24 (“FAL”) protects consumers by promoting honest advertising in the sale goods and services.

25 150. Plaintiffs are small businesses of the sort the FAL was designed to protect.

26 151. The FAL prohibits companies from making false or misleading statements to the
 27 public in connection with the sale of goods or services where the company knows or should know
 28 of the statement’s falsity.

 152. Reasonable purchasers of LinkedIn ads, including Plaintiffs, understood LinkedIn’s
 representation that they would only be charged when “someone” engaged with their ads to mean

1 that they would only be charged for genuine engagement by members of LinkedIn’s high-quality,
2 professional audience.

3 153. Reasonable purchasers of LinkedIn ads, including Plaintiffs, relied on LinkedIn’s
4 representation that they would only be charged when “someone” engaged with their ads when
5 purchasing LinkedIn ads and would not have paid for non-genuine engagement had it been
6 disclosed to them.

7 154. Because of LinkedIn’s closed ecosystem, Plaintiffs and the Class had no choice but
8 to believe LinkedIn’s representation that they would only be charged when “someone” engaged
9 with their ads.

10 155. As described above, LinkedIn regularly charges advertisers for non-genuine
11 engagement with ads, and as such, its representation that advertisers would only be charged when
12 “someone” engaged with their ads was false.

13 156. LinkedIn, and LinkedIn alone, knew or had reason to know of the falsity of its
14 representation that advertisers would only be charged when “someone” engaged with their ads is
15 false. LinkedIn is the world’s largest professional network, it generates billions in advertising
16 revenue each year, and it operates a walled garden, giving it exclusive insight into the composition
17 of its ad audience and the nature of their activities on the platform.

18 157. Alternatively, LinkedIn chose not to engage a third-party auditor of its metrics prior
19 to 2020, like its competitors did, and had it done so it would have known the falsity of its
20 representation that advertisers would only be charged when “someone” engaged with their ads.

21 158. LinkedIn’s false representation that advertisers would only be charged when
22 “someone” engaged with their ads was likely to deceive reasonable purchasers, and did deceive
23 Plaintiffs, who had no reason to know of the representation’s falsity at the time it was made and no
24 available means of verifying its accuracy.

25 159. LinkedIn’s false representation that advertisers would only be charged when
26 “someone” engaged with their ads duped Plaintiffs and the Class into believing that they would be
27 paying for legitimate engagement with their ads by LinkedIn’s professional, high-quality audience,
28 when, in fact, much of that engagement was automated, fraudulent, mistaken, and miscalculated.

1 160. Throughout the process of setting up ad campaigns, LinkedIn presented advertisers
2 with forecasted metrics. Once campaigns launched, LinkedIn provides performance metrics for
3 each campaign.

4 161. Reasonable purchasers of LinkedIn ads would have and did rely on LinkedIn's
5 represented user-engagement metrics. Because of LinkedIn's closed ecosystem and strict terms,
6 Plaintiffs and the Class had no choice but to do so.

7 162. LinkedIn's forecasted and actual metrics conveyed to advertisers including
8 Plaintiffs were inflated as described above, and therefore false.

9 163. LinkedIn, and LinkedIn alone, knew or had reason to know of the falsity its
10 forecasted and actual ad metrics. LinkedIn is the world's largest professional network, it generates
11 billions in advertising revenue each year, and it operates a walled garden, giving it exclusive insight
12 into the composition of its ad audience and the nature of their activities on the platform.

13 164. Alternatively, LinkedIn should have engaged a third-party auditor of its metrics
14 prior to 2020, like its competitors did, and had it done so it would have known he falsity of its
15 forecasted and actual ad metrics.

16 165. LinkedIn's inflated ad metrics were likely to and did deceive reasonable purchasers,
17 including Plaintiffs, who had no reason to know of the metrics' falsity and no available means of
18 verifying their accuracy.

19 166. LinkedIn's inflated metrics duped Plaintiffs and the Class members into believing
20 that their advertisements would and did receive greater engagement than was actually the case.

21 167. LinkedIn's false representation that advertisers would only be charged when
22 "someone" engaged with their ads and its inflated metrics caused Plaintiffs and the Class to suffer
23 Transaction-Specific Overcharges and Platform-Based Overcharges.

24 168. Pursuant to Cal. Bus. & Prof. Code § 17535, Plaintiffs, individually and on behalf
25 of the Class, seek public and private injunctive relief in the form of an order requiring LinkedIn to:
26 (1) maintain regular auditing of its ad metrics through the MRC or a similar accredited third-party
27 auditor; (2) adopt and maintain processes monitored and validated by an accredited third party for
28 limiting fraudulent and automated accounts on LinkedIn; (3) adopt and maintain processes

1 monitored and validated by an accredited third party for minimizing automated, fraudulent, and
2 mistaken engagement with LinkedIn ads; (4) utilize a multi-factor user-authentication system; (5)
3 conspicuously disclose non-genuine engagement to advertisers; (6) conspicuously warn advertisers
4 of the risks of non-genuine engagement; (7) implement and maintain a uniform system, monitored
5 and validated by an accredited third party, by which advertisers can dispute charges for suspected
6 non-genuine engagement; (8) conspicuously inform advertisers of the system for disputing charges
7 for suspected non-genuine engagement; (9) implement routine and regular training of customer
8 service, account management, and ad sales personnel regarding the signs and risks of non-genuine
9 engagement; (10) publish guide documents to educate current and potential advertisers regarding
10 the existence of non-genuine engagement, signs of non-genuine engagement, and the process for
11 disputing non-genuine engagement; (11) engage in marketing and advertising efforts to educate the
12 general public regarding the public and private costs of non-genuine engagement, and best practices
13 for identifying and reporting non-fraudulent and automated activity on LinkedIn.

14 169. Plaintiffs, individually and on behalf of the Class, also seek restitution to Plaintiffs
15 and the Class for the Transaction-Specific and Platform-Based Overcharges and attorneys' fees and
16 costs.

17 170. Plaintiffs lack an adequate remedy at law for the relief sought in conjunction with
18 this claim. No legal claim offers prospective relief that would prevent future injuries as the public
19 and private injunctive relief sought herein would do, nor does any legal claim entitle Plaintiffs to
20 restitution of the Transaction-Specific Overcharges combined with Platform-Based Overcharges.

21 171. Plaintiffs demand a trial by jury on their claim for restitution under the FAL.

22 **SECOND CAUSE OF ACTION**

23 **(On behalf of the Class)**

24 **CALIFORNIA UNFAIR COMPETITION LAW,
25 CAL. BUS. & PROF. CODE §§ 17200, *et seq.***

26 172. Plaintiffs re-allege and incorporate by reference herein all the allegations contained
27 above.
28

1 173. California’s Unfair Competition Law, Cal. Bus. & Prof. Code §§ 17200 *et seq.*
2 (“UCL”) protects consumers and competitors by promoting fair competition in commercial markets
3 for goods and services.

4 174. Plaintiffs are small businesses of the sort the UCL was designed to protect. Noirefy
5 has two full-time employees, and TopDevz three. Neither company has an in-house ad analytics
6 team.

7 175. The UCL prohibits any unlawful, unfair, or fraudulent business act or practice. A
8 business practice need only meet one of the three criteria to be considered unfair competition.
9 LinkedIn violated all three.

10 176. LinkedIn’s promise that advertisers would only be charged for views, clicks, and
11 impressions by “someone,” and its dissemination of inflated performance metrics and forecasted
12 metrics violated the UCL’s prohibition on deceptive conduct because it was likely to and did
13 mislead consumers, including Plaintiffs.

14 177. Reasonable purchasers of LinkedIn ads, including Plaintiffs, understood LinkedIn’s
15 representation that they would only be charged when “someone” engaged with their ads to mean
16 that they would only be charged for genuine engagement by members of LinkedIn’s high-quality,
17 professional audience.

18 178. Reasonable purchasers of LinkedIn ads, including Plaintiffs, relied on LinkedIn’s
19 representation that they would only be charged when “someone” engaged with their ads when
20 purchasing LinkedIn ads, and would not have paid the prices charged had they known that
21 representation to be false.

22 179. Because of LinkedIn’s closed ecosystem, Plaintiffs and the Class had no choice but
23 to believe LinkedIn’s representation that they would only be charged when “someone” engaged
24 with their ads.

25 180. As described above, LinkedIn regularly charged advertisers for non-genuine
26 engagement with ads, and as such, its representation that advertisers would only be charged when
27 “someone” engaged with their ads was false.

28

1 181. LinkedIn’s false representation that advertisers would only be charged when
2 “someone” engaged with their ads was likely to deceive reasonable purchasers, and did deceive
3 Plaintiffs, who had no reason to know of the representation’s falsity at the time it was made and no
4 available means of verifying its accuracy.

5 182. LinkedIn’s false representation that advertisers would only be charged when
6 “someone” engaged with their ads duped Plaintiffs and the Class into believing that they would be
7 paying for legitimate engagement with their ads by LinkedIn’s professional, high-quality audience,
8 when, in fact, much of that engagement was automated, fraudulent, mistaken, and miscalculated.

9 183. Throughout the process of setting up ad campaigns, LinkedIn presented advertisers
10 with forecasted metrics. Once a campaign has gone active, LinkedIn provides performance metrics
11 for each campaign.

12 184. Reasonable purchasers of LinkedIn ads would have and did rely on LinkedIn’s
13 represented user-engagement metrics. Because of LinkedIn’s closed ecosystem and strict terms,
14 Plaintiffs and the Class had no choice but to do so.

15 185. LinkedIn’s forecasted and actual metrics conveyed to advertisers including Plaintiff
16 were inflated as described above, and therefore false.

17 186. LinkedIn’s inflated ad metrics were likely to and did deceive reasonable purchasers,
18 including Plaintiffs, who had no reason to know of the metrics’ falsity and no available means of
19 verifying their accuracy.

20 187. LinkedIn’s inflated metrics duped Plaintiffs and the Class members into believing
21 that their advertisements would and did receive greater engagement than was actually the case.

22 188. LinkedIn’s false representation that advertisers would only be charged when
23 “someone” engaged with their ads and its inflated metrics caused Plaintiffs and the Class to suffer
24 Transaction-Specific Overcharges and Platform-Based Overcharges.

25 189. In addition to being deceptive, LinkedIn’s misconduct was unlawful. As set forth
26 in the First Cause of Action, above, LinkedIn’s overstatement of metrics and its false representation
27 that advertisers would only be charged when “someone” engaged with their ads violated the FAL.
28

1 190. As set forth above, LinkedIn’s unlawful conduct caused Plaintiffs and the Class to
2 suffer Transaction-Specific Overcharges and Platform-Based Overcharges.

3 191. Finally, LinkedIn’s misconduct is immoral, unethical, unscrupulous, and
4 substantially injurious to consumers, and is therefore unfair under the UCL.

5 192. As noted above, unlike its largest competitors and contrary to industry best-
6 practices, LinkedIn chose to self-audit its ad metrics until 2020.

7 193. At the same time, LinkedIn actively prevented its advertisers from collecting
8 performance data relating to their campaigns or disputing LinkedIn’s reported metrics, leaving
9 advertisers entirely dependent on LinkedIn to provide accurate metrics.

10 194. Because of LinkedIn’s longstanding refusal to engage a third-party to audit the
11 accuracy of its ad metrics, and its obstruction of any meaningful ability for its advertisers to validate
12 or challenge LinkedIn’s metrics, it created an environment where inflated metrics would not only
13 go uncorrected but would also benefit LinkedIn. Inevitably, inflated metrics inflated the perceived
14 value of LinkedIn’s platform, causing substantial harm to its advertisers.

15 195. Absent any external feedback or validation mechanism, non-genuine engagement
16 pervaded LinkedIn’s platform, artificially inflating all performance metrics.

17 196. LinkedIn’s inflated metrics artificially increased demand as advertisers prepared
18 their campaigns, when advertisers bid and agreed to pay Rates for campaigns, and after campaigns
19 were launched, when advertisers viewed campaign performance.

20 197. Because of the repeated and pervasive inflation of metrics presented, not only were
21 bidding advertisers more willing to pay than they otherwise would have been, so too were all the
22 other advertisers competing in LinkedIn’s auctions. As a result, the second price was higher than
23 it otherwise would have been, and the “winning” advertisers paid artificially inflated prices.

24 198. Thus, LinkedIn’s years of falsely reporting ad metrics at each stage of the
25 advertising process led to artificially inflated demand and caused Plaintiffs and the Class to suffer
26 Transaction-Specific Overcharges and Platform-Based Overcharges.

27 199. Pursuant to Cal. Bus. & Prof. Code §§ 17203 and 17204, Plaintiffs, individually and
28 on behalf of the Class, seek public and private injunctive relief in the form of an order requiring

1 204. Plaintiffs and Class members contracted with LinkedIn to place ad campaigns.

2 205. LinkedIn's obligations to Plaintiffs and the Class arise from the LinkedIn Ads
3 Agreement and the parties' course of dealing.

4 206. When LinkedIn accepted Plaintiffs' and the Class members' ad-campaign bids, the
5 Ads Agreement obligated Plaintiffs and the Class to pay LinkedIn at the agreed-upon Rate.

6 207. Plaintiffs and Class members met all or substantially all of their contractual
7 obligations, including submitting their advertising for LinkedIn's approval and paying for
8 LinkedIn's advertising services.

9 208. One of LinkedIn's obligations is to provide Plaintiffs and Class members with
10 accurate ad metrics. This obligation is implied by LinkedIn's conduct when dealing with the Class,
11 including LinkedIn's monopoly over audience and user-engagement data, and over the verification
12 and delivery of ad metrics.

13 209. LinkedIn's obligation to provide accurate metrics is also implied by industry
14 practice, which dictates that the platform provider accurately tells the advertiser how each campaign
15 performs, and that the provider screen for fraudulent activity when doing so.

16 210. LinkedIn's obligation to provide accurate metrics also arises from the Ads
17 Agreement. Plaintiffs and the Class members were obligated to pay LinkedIn the agreed-upon Rate
18 for ad campaigns. *See* Ex. A, § 3. Because the Rate necessarily includes a metric, such as "price
19 per impression or click, *see id.*, LinkedIn was obligated to use reasonable care to calculate and
20 apply that Rate correctly.

21 211. Under California law, LinkedIn was required to perform its contractual obligations
22 to accurately communicate and calculate ad metrics competently and with reasonable care.
23 LinkedIn breached that duty by failing to maintain industry-standard auditing systems, resulting in
24 LinkedIn charging Plaintiffs and the Class for non-genuine engagement.

25 212. Had LinkedIn used reasonable care in calculating Rates and providing accurate
26 metrics, Plaintiffs and the Class would not have been charged for non-genuine engagement.

27
28

- 1 implementing routine and regular training of customer service, account management, and
- 2 ad sales personnel regarding the signs and risks of non-genuine engagement; (10) publishing
- 3 guide documents to educate current and potential advertisers regarding the existence of non-
- 4 genuine engagement, signs of non-genuine engagement, and the process for disputing non-
- 5 genuine engagement; and (11) engaging in marketing and advertising efforts to educate the
- 6 general public regarding the public and private costs of non-genuine engagement, and best
- 7 practices for identifying and reporting non-fraudulent and automated activity on LinkedIn;
- 8 c. Restitution to Plaintiffs and the Class for the Transaction-Specific and Platform-Based
- 9 Overcharges;
- 10 d. Damages in an amount to be determined at trial;
- 11 e. Plaintiffs’ attorneys’ fees and costs; and
- 12 f. Such other and further relief as is just and proper.

DEMAND FOR JURY TRIAL

13
14 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs hereby demand trial
15 by jury in this action of all issues so triable.

16
17 Dated: August 17, 2021

Respectfully submitted,

18 s/ J. Dominick Larry

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Exhibit A

LinkedIn Ads Agreement

Last revised on July 16th, 2020.

The following terms (the “LinkedIn Ads Agreement” or “Agreement”) apply to your use of LinkedIn’s online advertising platform and the associated self-serve, auction-based ad services (the “Ad Services”). The Ad Services allow your ads to be served on properties of LinkedIn and enabled third parties (collectively, “Properties”), e.g., LinkedIn Audience Network websites and mobile applications. By registering for or using our online Advertising platform or our Ad Services, you agree to the terms of this Agreement, so please take a moment to read them.

1. Agreement

When you use our Ad Services you agree to this Ads Agreement, our Advertising Policies and the terms for optional features.

If you use the Ad Services for a third party, you must have permission to do so.

In addition to the [LinkedIn User Agreement](#), [Privacy Policy](#) and [Cookie Policy](#), this Ads Agreement and our Advertising Policies apply to the access and use of the Ad Services. Additional terms may apply to specific features of the Ad Services. For example, [additional terms](#) included herein apply to the use of optional features like conversion tracking, website demographics, matched audiences, and lead gen forms.

If you have entered into a separate advertising agreement with LinkedIn with terms that cover subject matter also addressed in this Ads Agreement, those separate terms govern with respect to that subject matter but this Ads Agreement (including the Advertising Policies and the [Terms for Optional Features](#)) governs with respect to any additional subject matter (e.g. conversion tracking, website demographics, matched audiences, and lead gen forms). Otherwise, this Ads Agreement (including the Advertising Policies and the [Terms for Optional Features](#)) govern with respect to all use of the Ad Services.

If you are accessing or using the Ad Services on behalf of a business or third party, you represent and warrant that you have the authority to do so and to bind that business or third party to this Ads Agreement, and your agreement to this Ads Agreement will be treated as their respective agreement. In this event, LinkedIn may hold you responsible for violations of this Ads Agreement by that business or third party, and "you," "your" and "party" will also refer and apply to that business or third party.

2. Ad Services

We try to optimize your campaigns and offer you optimization choices.

Your use of the Ad Services must comply with Applicable Law and all applicable terms.

You are responsible for use of the Ad Services through your account.

If you use the Ad Services for a business, that business can receive information about your use and remove you from its accounts.

We may reject Ads, modify or terminate the Ad Services and participate in auctions for ads on the Ad Services.

The Ad Services are designed to enhance the effectiveness of your campaigns. LinkedIn may offer you choices about whether you would like to use certain automated optimizations (e.g., to opt-out of automatic expansion of your specific targeting criteria or to participate in optimized bidding). With your permission, LinkedIn also may manually assist you with your campaigns.

You are responsible for (i) all ads and content therefor submitted by or on your behalf through the Ad Services or otherwise to LinkedIn, including the creatives, , text, images, branding, URLs, tags, and pixels that comprise the ads and content thereof (collectively, your "Ads"), (ii) all ad trafficking or targeting decisions made by or on your behalf, (iii) all content and property to which Ads direct viewers, as well as redirects ("Destinations"), and (iv) all services and products advertised on Destinations ("Advertised Goods"). Except as expressly agreed by LinkedIn in writing, LinkedIn will determine the size, placement and positioning of your Ads. LinkedIn will serve your Ads as inventory becomes available on the Properties. Your Ads, Destinations, Advertised Goods and use of the Ad Services must comply with the Advertising Policies and all applicable laws, self-regulatory rules, industry rules and governmental requirements (collectively, "Applicable Law").

You are responsible for any activity conducted through your account, including any purchases made or charges incurred. If you identify that you are using the Ad Services on behalf of a business, you agree that LinkedIn may share information about your purchases and use of the Ad Services with that business, including its representatives and agents. If that business indicates that you are no longer authorized to place ads on its behalf (e.g., if you leave that business or change roles within that business), you agree you may be removed from accounts associated with that business.

Without limiting the prohibitions in the Advertising Policies or [User Agreement](#), you will not, and you will not enable or authorize any third party to (a) engage in illegal or fraudulent conduct (for example, to discriminate against protected classes), including by virtue of the Ads, Destinations, Advertised Goods or use of the Ad Services, (b) except as expressly authorized by LinkedIn in writing, use any automated means or form of scraping or data extraction to access, query or otherwise collect information from the Properties, (c) except as expressly authorized by LinkedIn in writing, copy, modify or create derivative works of the Ad Services or any related technology, (d) provide Ads that assert or imply personal characteristics, or (e) provide Ads that contain malware, spyware or any other malicious code or otherwise interfere with the operation of the Ad Services or any device or system or breach or circumvent any security measure of LinkedIn or a third party. LinkedIn may reject, remove or not deliver any Ad at any time for any reason, including to comply with Applicable Law (defined below).

LinkedIn may, in its sole discretion, modify, or terminate any part or all of the Ad Services or suspend your ability to use the Ad Services (including in instances where you do not meet LinkedIn's credit approval requirements). LinkedIn and its

affiliates retain the complete and unqualified right to serve advertisements for its own products and services and to participate in auctions through the Ad Services to serve such advertisements.

3. Fees, Payment and Cancellation.

We will charge you periodically on the basis shown when your campaign was set up.

You agree to pay on the basis and at the rate shown when a campaign, order or other purchase was submitted through your account ("Rate"), e.g., price per impression, click, other conversion, lead or period, whether with a fixed or automatically optimized bid, whether with daily budget, lifetime pacing, or other budget options. You also agree to pay all applicable taxes, government charges and foreign exchange fees. For these purposes, taxes include all federal, state, and local sales, use, gross receipts, VAT, GST, levies and similar transaction taxes. You will have no liability for income taxes that are statutorily imposed on LinkedIn including taxes or fees measured by LinkedIn's net or gross income.

LinkedIn will periodically charge your payment method at the applicable Rate. All amounts paid are non-refundable. You remain responsible for any uncollected amounts. LinkedIn may charge interest for any overdue amounts at the rate of the lesser of 1% per month or the lawful maximum, and you agree to reimburse us for all collection costs for overdue amounts. To the extent you have not spent your designated budget, you may limit or stop additional charges by editing the budget through your account or suspending or canceling the campaign. LinkedIn will endeavor to cease serving your Ads promptly following your suspension or cancellation, but you agree to pay and will be charged at the Rate for Ads delivered up until they cease to be displayed. LinkedIn may store and update (e.g. upon expiration) your payment method for use with subsequent campaigns, orders and purchases submitted through your account.

The amount you owe will be calculated based on LinkedIn's tracking mechanisms. LinkedIn is not responsible for click fraud, fraudulent leads, technological issues or other potentially invalid activity by third parties that may affect the cost of running Ads. Your exclusive remedy for suspected invalid activity is to make a claim for an Ad Services credit within 90 days of the date of that activity, and LinkedIn's exclusive liability is, in LinkedIn's sole discretion, to issue Ad Services credit for suspected invalid activity. Any Ad Services credit that you may accrue are non-refundable and non-transferable and must be used prior to termination of this Ads Agreement or your account.

4. Intellectual Property Rights and Privacy.

You grant us a license to your ads to perform the Ad Services.

We may use feedback and testimonials you choose to provide.

LinkedIn's pricing, metrics, member demographics and beta features are confidential.

Each party will prominently post a complete and accurate privacy policy, including with respect to cross-device tracking and ad targeting.

You may not target Ads based on Sensitive Data.

You may use Ad Services Data only on an aggregate and anonymous basis to assess the performance and effectiveness of your campaigns and to optimize your campaigns. You must protect the confidentiality of Ad Services Data using industry standard security safeguards.

You grant to LinkedIn a non-exclusive, worldwide, royalty-free, sublicensable and transferable license to use, copy, modify, distribute and publish your Ads in connection with the performance of the Ad Services (including for testing, compliance, marketing and promotional purposes). You represent and warrant that you own or have all necessary rights (including intellectual property rights) to your Ads (including to grant the license above).

If you choose to provide suggestions and feedback to LinkedIn, you agree that LinkedIn can (but does not have to) use and share such feedback for any purpose without compensation to you. You may not disclose any information about LinkedIn's pricing, metrics, member demographics or beta features. If you provide testimonials about our Ad Services or submit Ads to LinkedIn, we may post those testimonials and Ads in connection with our promotion of the Ad Services. LinkedIn reserves all of its intellectual property rights in the Ad Services as further described in the [User Agreement](#).

Each party will comply with Applicable Law relating to its performance of this Ads Agreement, including privacy and security laws (e.g., the EU General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), as well as the Data Processing Agreement where and as applicable). As provided in LinkedIn's [Privacy Policy](#), we may use device identifiers obtained on and off our Services for our Ad Services, including to determine which devices our members may use and to serve Ads to them on their different devices. Each party will prominently post a complete and accurate privacy policy on its websites and mobile applications, including with respect to cross-device tracking and ad targeting. LinkedIn's participation in advertising self-regulatory bodies is described [here](#). LinkedIn may include a link to an enhanced notice and choice mechanism in or around your Ads (e.g., through an Advertising Option Icon). Without limiting the prohibitions in the Advertising Policies or [User Agreement](#), you will not, and you will not enable or authorize any third party to, (a) except with the explicit opt-in consent of the applicable individual, associate any data obtained in connection with the Ad Services ("Ad Services Data") with data that is personally identifiable (as defined by Applicable Law) ("Personal Data") or otherwise re-identify such data, or (b) target Ads based on sensitive data (as defined by Applicable Law) ("Sensitive Data").

Except as expressly provided in the [Terms for Lead Gen Forms](#) with respect to Form Data, you may use Ad Services Data only on an aggregate and anonymous basis to assess the performance and effectiveness of your campaigns using the Ad Services and to optimize your campaigns. Ad Services Data includes Form Data and data collected through pixels included with your Ads. You agree to use reasonable measures to protect the confidentiality of Ad Services Data and to use appropriate security safeguards to protect Ad Services Data in accordance with industry standards. You may share Ad Services Data only with someone acting on your behalf, such as your service provider, provided that you are responsible for ensuring their respective compliance with this Ads Agreement and for limiting their

respective use of the Ad Services Data on your behalf. Without limiting the foregoing, you shall not: (i) sell the Ad Services Data, (ii) combine the Ad Services Data with any data obtained by or on behalf of another advertiser or (iii) except for use solely on your own behalf in compliance with this Ads Agreement, transfer any Ad Services Data (including anonymous, aggregate, or derived data) to any ad network, ad exchange, data broker or other advertising or monetization related service.

5. Disclaimer of Warranties.

This is our disclaimer of legal liability for the use of the Ad Services

To the extent allowed under law, in addition to disclaiming all implied warranties and other warranties as provided in the User Agreement, LinkedIn disclaims all warranties regarding the accuracy of the information on which targeting categories are based (e.g., member profile information or segments that you or third parties provide), the match rate or changes to such rate for Matched Audiences, the rate at which inventory for your Ads becomes available on the Properties, the nature and content of the Properties on which Ads are served, the match rate for block lists of Properties, the results of your campaigns and other uses of the Ad Services.

6. Indemnity.

This is your indemnification obligation.

Notwithstanding any review or approval of any Ad by LinkedIn, you agree to indemnify LinkedIn and our affiliates and hold LinkedIn and our affiliates harmless from any damages, losses and costs (including, reasonable attorneys' fees) related to third party claims or proceedings, arising out of or related to your Ads, Destinations, Advertised Goods, use of the Ad Services and breach of this Ads Agreement

7. Limitation of Liability.

These are the limits of legal liability each of us may have to the other.

To the fullest extent permitted by law, neither party, including its respective affiliated companies, will be liable to the other in connection with this Ads Agreement for lost profits or lost business opportunities, loss of data, or any indirect, incidental, consequential, special or punitive damages.

Neither party, including its respective affiliated companies, will be liable to the other in connection with this Ads Agreement for an amount that exceeds the greater of (a) 5 times the total fees paid or payable to LinkedIn during the 1-month period before the event giving rise to the liability or (b) USD \$100.00.

These limitations of liability do not apply to a party's (i) payment, confidentiality or indemnification obligations; (ii) liability for fraud, gross negligence or intentional misconduct; (iii) liability for death or personal injury; or (iv) violation of the other party's intellectual property rights.

8. Data Processing Agreement.

If either party processes Personal Data (as defined in Section 1 of the DPA) on behalf of the other pursuant to this Ads Agreement, then we will each comply with the terms of the LinkedIn Data Processing Agreement, currently available [here](#).

9. Miscellaneous.

Here are some important details about this Ads Agreement, including changes to the terms, surviving terms, the contracting LinkedIn entity and dispute resolution.

The provisions of the User Agreement relating to feature-specific terms, interpretation, notice and assignability apply to this Ads Agreement and the Ad Services. Neither party relies on any undertaking, promise, assurance, statement, representation, warranty or understanding (whether in writing or not) of any person (whether a party to this Ads Agreement or not) relating to the subject matter of this Ads Agreement, other than as stated in this Ads Agreement. This Ads Agreement does not create a partnership, agency relationship, employer relationship or joint venture between the parties.

LinkedIn may change the terms of this Ads Agreement by notice to you (for example, by a notice displayed in the Ad Services, email, text message or mail), and both parties agree that changes cannot be retroactive. If you do not agree to these changes, you must stop using the Ad Services. The following provisions of this Ads Agreement survive its termination: Sections 2 through 4, as well as Sections 6 through 9.

The LinkedIn entity entering into this Ads Agreement with you is determined pursuant to the [Contracting Entity Terms](#). If an issue arises under this Ads Agreement (including non-contractual disputes or claims) and the contracting entity based on the Contracting Entity Terms is (a) LinkedIn Corporation, then this Ads Agreement is governed by the laws of the State of California, and any action or proceeding (including those arising from non-contractual disputes or claims) related to this Ads Agreement will be brought in a federal court in the Northern District of California; (b) LinkedIn Ireland Unlimited Company, then this Ads Agreement is governed by the laws of Ireland, and any action or proceeding (including those arising from non-contractual disputes or claims) related to this Ads Agreement will be brought in Dublin, Ireland; (c) LinkedIn Singapore, then this Ads Agreement is governed by the laws of Singapore, and any action or proceeding (including those arising from non-contractual disputes or claims) related to this Ads Agreement will be brought in Singapore, or (d) Beijing Lingyin Information Technology Co., Ltd, then this Ads Agreement is governed by the laws of the People's Republic of China, and any action or proceeding (including those arising from non-contractual disputes or claims) related to this Ads Agreement will be brought in China. Each party irrevocably submits to the jurisdiction and venue of the applicable courts. The prevailing party in any litigation may seek to recover its legal fees and costs. Notwithstanding the foregoing, if you have your registered office within the European Union, LinkedIn may agree to facilitate referral of a dispute to one of the following [mediation service providers](#) in the first instance where, due to the nature of the dispute, such referral is likely to bring about a prompt and definitive resolution.

Additional Terms for Optional Features:

If you have entered into a separate advertising agreement with LinkedIn with terms that cover subject matter also addressed in the Ads Agreement, those separate terms govern with respect to that subject matter but the Ads Agreement (including the Advertising Policies and the Terms for Optional Features) still governs with respect to any additional subject matter (e.g. conversion tracking, website demographics, analytics and matched audiences , as well as lead gen forms). Otherwise, the Ads Agreement (including the Advertising Policies and the Terms for Optional Features) govern with respect to all use of the Ad Services. LinkedIn may, in its sole discretion, modify, or terminate any part or all of the Optional Features or suspend your ability to use the Optional Features (including in instances where you do not meet LinkedIn's credit approval requirements).

Terms for Conversion Tracking, Website Demographics and LinkedIn Matched Audiences:

If you use conversion tracking, website demographics or LinkedIn Matched Audiences, you must give any notice, obtain any consent and provide any choice required by Applicable Law regarding any use of Event Data and Audience Data, and the underlying technology that enables it (e.g. cookies), for these activities. You are responsible for your use of Event Data and Audience Data.

If you transfer Personal Data to us, we must authorize the transfer and we will only process the data if you are the Data Controller.

You may not transfer data regarding children or Sensitive Data to LinkedIn.

Here are some important details about how LinkedIn will process your Event Data and Audience Data.

Through LinkedIn's conversion tracking and website demographics features, you can understand what happens after a LinkedIn user clicks on your Ad by using analytics methods and systems provided by LinkedIn (e.g., Insight tags, pixels and APIs) that allow you to send data to LinkedIn and its affiliates about actions that people take on your websites or mobile applications ("Event Data"). Through LinkedIn Matched Audiences and associated data integrations, you can target Ads to audiences based on data you provide to LinkedIn, whether directly or on your behalf through an authorized third party (e.g., company lists, hashed contact information, device identifiers, or Event Data like web pages visited on your website) (such data, collectively, "Audience Data"). These terms apply if you use LinkedIn's conversion tracking or website demographic features, LinkedIn Matched Audiences or otherwise send Audience Data to LinkedIn or its affiliates in connection with these features.

You agree that under Applicable Law, you have provided sufficiently clear, meaningful and prominent notice to, and have the appropriate consent from, the applicable individuals regarding any collection, disclosure, use and security of their information (e.g., Event Data and other Audience Data) for the activities under these terms (e.g., online behavioral advertising or interest-based advertising). To the extent you are engaged in retargeting, online behavioral advertising or interest-based advertising and without limiting the foregoing, you also agree that (i) you have provided users the ability to opt-out of the collection or use of their data for

such advertising (whether by following opt-out instructions on your websites and mobile applications or by accessing a direct link to an industry-standard opt-out website like www.networkadvertising.org/choices or www.aboutads.info/choices), (ii) you have provided enhanced notice of their ability to opt-out and of the use of their data for retargeting, online behavioral advertising or interest-based advertising, and (iii) you honor any such opt-outs. You are responsible for the accuracy and your use of Audience Data. You can learn more about how analytics methods provided by LinkedIn (e.g., Insight tags and pixels) [here](#).

Except as expressly authorized by LinkedIn in writing (including in Campaign Manager), you agree not to transfer to LinkedIn or its affiliates any Personal Data (whether Audience Data or otherwise). Insofar as the Personal Data of individuals located in the EU/EEA is disclosed to, or otherwise processed by LinkedIn, you agree that you are a Data Controller (as defined by Applicable Law). LinkedIn and its affiliates process such Personal Data only on your behalf and subject to your instructions, including specifically to improve the Ad Services by (i) optimizing relevance algorithms and (ii) finding LinkedIn members probabilistically across devices. With respect to the Personal Data of European Union residents, all parties agree to comply with the applicable standard contractual clauses. Without limiting the foregoing, you will not transfer to LinkedIn or its affiliates any data that you know or reasonably should know is from or about children under the age of 13 or that includes Sensitive Data.

LinkedIn and its affiliates may use your Audience Data to provide you insights (which do not identify individual members) about the population associated with that dataset, the targeting or performance of your Ads or to optimize your campaigns. If you use LinkedIn Matched Audiences, LinkedIn and its affiliates will use your Audience Data to allow you to target your Ads. LinkedIn may use your Event Data, whether during or after the term of the Ads Agreement, to optimize the systems of LinkedIn and its affiliates and find LinkedIn members probabilistically, provided that LinkedIn and its affiliates will: (x) prior to optimizing LinkedIn's systems, remove the direct association to personal identifiers from such Event Data to avoid identifying members or advertisers; (y) not allow other advertisers or third parties to target advertising on the basis of such Event Data; and (z) not create or enhance individual behavioral profiles based on Event Data. Except for the limited use cases of Event Data specified in this Agreement, LinkedIn does not use, sell or otherwise share with third parties any Event Data or other Audience Data. Audience Data (including Event Data) are subject to LinkedIn's [Privacy Policy](#), including LinkedIn's obligation to implement appropriate security safeguards designed to protect your information in accordance with industry standards.

Terms for Lead Gen Forms:

If you use Lead Gen Forms, you must give any notice, obtain any consent and provide any choice required by Applicable Law regarding any use of Form Data for these activities.

You may not request Sensitive Data in a Lead Gen Form.

Form Data will be available for 90 days.

Other than for housing, credit or employment purposes, you may use Form Data for your own lawful purposes agreed to by the individual.

LinkedIn offers Ads that allow people to submit their contact and other information to you ("Lead Gen Forms"). These terms apply if you use Lead Gen Forms.

You are responsible for, and agree that under Applicable Law, you will, provide sufficient notice and choice for, and obtain the appropriate consent regarding, any collection, disclosure, use and security of data submitted to you through Lead Gen Forms ("Form Data"). Without limiting the foregoing, you must include a link to your privacy policy in each Lead Gen Form. Any custom questions in your Lead Gen Form may not include requests for Sensitive Data, including racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information, sexual orientation, criminal records, government-issued IDs, logins and passwords, financial information, and information regarding minors or students. LinkedIn has the right, at its discretion, to refuse any custom question. The Form Data generally will be available to you or an authorized third party through LinkedIn for 90 days, and you or such third party are responsible for promptly obtaining a copy of and storing Form Data on your behalf.

Subject to the privacy policy linked in the Lead Gen Forms, the privacy expectations of the applicable individual, Applicable Law and these terms, as well as the scope of any consents obtained through the Lead Gen Forms, you may: (a) use Form Data and (b) share Form Data only with someone acting on your behalf, such as your service provider, provided that you are responsible for ensuring their respective compliance with the Ads Agreement and for limiting their respective use of Form Data on your behalf. You may not: (i) sell Form Data under any circumstances or (ii) use Form Data in any unlawful manner (e.g. unlawful discrimination). If any individual requests to opt-out or have his or her Form Data deleted, you will honor such request promptly.

Terms for Third Party Reporting:

At your choice, we may transfer your data to authorized third parties for analysis, reporting and attribution.

To the extent you participate in data analysis, reporting and attribution programs with authorized third parties, you grant LinkedIn the right to transfer your campaign and performance data to such third parties for purposes of providing campaign analytics, reporting, attribution other lawful purposes for which you have authorized such third parties, subject to the Ads Agreement.

Exhibit B

THE
Sophisticated
MARKETER'S
Guide to
LinkedIn

NEW FOR
2017

LIMITED EDITION

Table of Contents

A Note to the Sophisticated Marketer



What is a Sophisticated Marketer? It's someone who understands the fundamental, unchanging principles of marketing but has absolute confidence applying those principles to new techniques and platforms.

The Sophisticated Marketer is hungry to try new things and learn new skills — but equally committed to testing effectiveness, optimizing around what works, and demanding robust data and ROI. They recognize social media and content marketing as threads that run throughout their integrated marketing strategies —

fundamental to the task of building a brand and growing a business. They craft hybrid strategies for achieving their goals, grasping the opportunity to learn new skills along the way.

They have fun — and LinkedIn is their playground.

Research released by the Content Marketing Institute (CMI) at the start of 2017 shows more content marketers finding success on LinkedIn than on any other social platform. That's because LinkedIn is the natural environment for a Sophisticated Marketer. As the world's largest professional content platform it embodies the potential of social and content combined — but it can do a lot more besides.

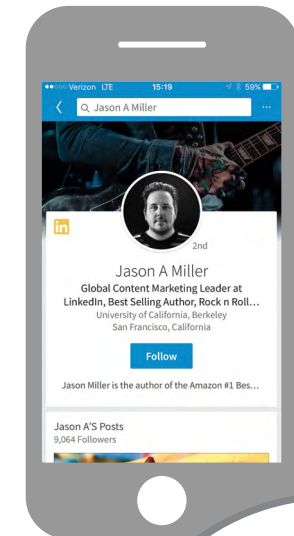
On LinkedIn, you can target audiences with precision, delivering innovative display ads and mail messages with guaranteed deliverability and exceptional response rates. You can tailor content to your

different audiences, test different creative approaches, keep experimenting creatively, and drive ROI by doubling down on what works. You can mix organic and paid activity, build influencer brands across your business, dovetail more effectively with sales, and keep exploring new ways to grow.

We've updated this Guide for 2017, with all of the latest LinkedIn features, tips and tactics to help Sophisticated Marketers like you get more from our platform. It's both an instruction manual and a strategic guide — a one-stop shop to the vast opportunities for increasing awareness, influencing perception, driving high-quality leads, and growing revenue.

Let's get started, shall we?

Jason Miller
Group Manager, Content Marketing
LinkedIn Marketing Solutions





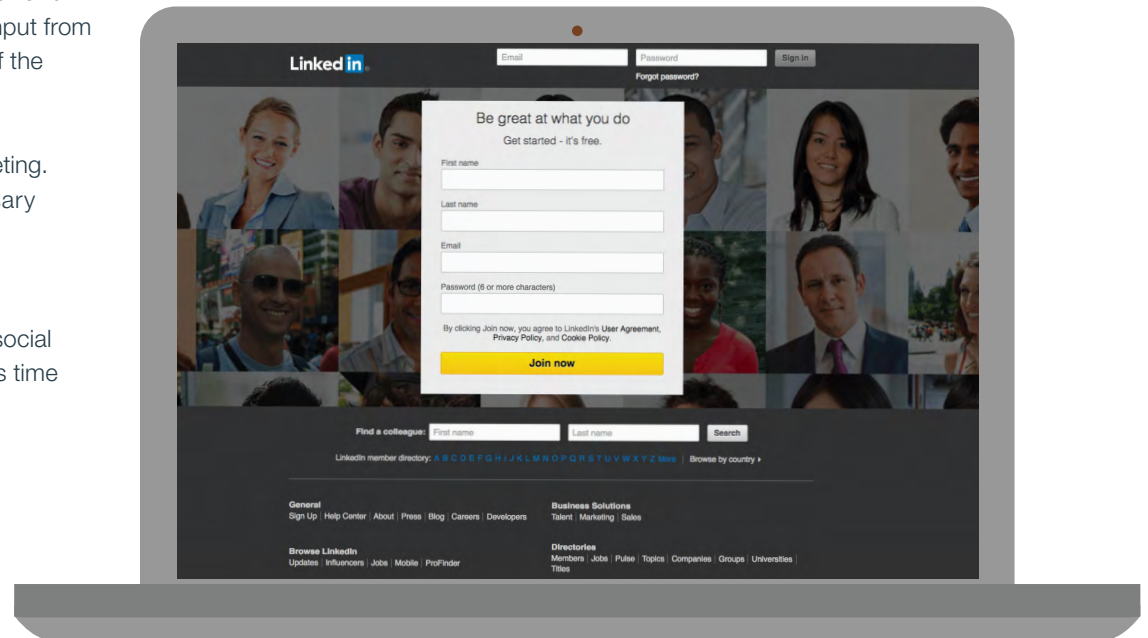
Why Should You Read This Guide?

LinkedIn has products that impact every stage of the purchase process. The goal of this guide is to provide the absolute best, most up-to-date, definitive guide for marketers to learn how to market to who matters on LinkedIn as part of their integrated approach to marketing.

This guide is a labor of love for us here at LinkedIn. We created it to be a one-stop shop for everything you need to know about getting the most value out of LinkedIn for yourself and your company. It's not just an instruction manual, but a strategic guide with lots of input from top thought leaders and LinkedIn marketing experts, combined with the expertise of the LinkedIn Marketing Solutions team.

And it's all about how to truly tap into the potential and power of social media marketing. That's because social media marketing is no longer a nice-to-have. It's a necessary part of a successful integrated marketing approach for driving awareness, leads and ultimately revenue.

We call this "The Sophisticated Marketer's Guide" because we feel it's time to take social media marketing to the next level, moving beyond theory to enlightened practice. It's time to get real results with your social marketing, and this guide will help.



CHAPTER 1

Why Does Your Business Need LinkedIn?

These days in the business world, relationships matter more than ever. People tune out irrelevant or promotional messages. But they do want to engage with companies that focus on sharing useful and relevant information and content. The companies that inform and engage aren't just selling — they're building relationships.

LinkedIn is where, by far, the largest number of professionals gather to stay connected and informed, advance their careers, and work smarter. More than 467 million professionals are on LinkedIn. These are the decision makers, influencers, and leaders of today and tomorrow — the people you want to target, all in one place.

On LinkedIn, we have:

- 61 million senior-level influencers
- 40 million decision makers
- 10.7 million opinion leaders
- 6.8 million C-level execs
- 3 million MBA graduates

Professionals are not just coming to LinkedIn in huge numbers; they're engaging with a huge purpose. They're coming specifically to connect to networks, brands and opportunities by engaging with high-quality content across the LinkedIn platform. This is a very different mindset and intent from other social media platforms; we're driven by our members' professional aspirations.

The world's professionals come to LinkedIn for:

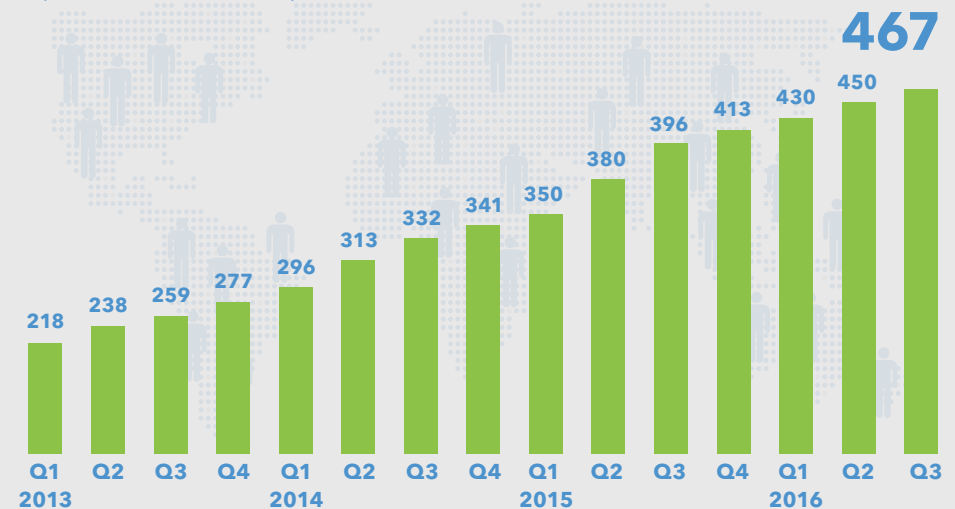
- Industry news
- Expert advice
- Career training
- Peer insights and recommendations
- Content published by LinkedIn's 500+ Influencers

The World's Professionals Come to LinkedIn for Knowledge

There are 2 million publishers posting fresh content on LinkedIn — along with peer posts in the Feed, long-form content, LinkedIn Groups and 7 million brand-managed company pages. LinkedIn is the definitive professional publishing platform, where our members come to learn, share and get inspired.

THE WORLD'S LARGEST PROFESSIONAL NETWORK

(in millions of members)



Source: "LinkedIn Announces First Quarter 2016 Results," LinkedIn, 2016

CHAPTER 1

LinkedIn is a platform enabling sophisticated marketers to forge relationships with these professionals. In fact, this is the first time in the history of media you can engage with the world's professionals in one place. It's no wonder LinkedIn has quickly become the go-to content publishing platform for marketers.

Why are the world's professionals now gathering in this one place, on LinkedIn? Because the people you're looking to market to are just like you and me. We're all searching for the right destinations to find the best information, and there are actually fewer places where we're gathering in large numbers.

With LinkedIn, you're reaching a **quality audience** in a **professional context**. And, you can engage them in a very meaningful way: by **sharing valuable content** with products tailored to how professionals engage. By doing so, you become part of your audience's conversations and education on the platform.

All it takes is a sophisticated marketer who seizes the opportunity to engage them.

What do we mean by a sophisticated marketer? The idea of being a sophisticated marketer comes from the transition of social media marketing from pure theory to effective use. But marketers can't just "do" social. Now they need to produce results and actionable insights in order to prove the value of their efforts. Fortunately, we are no longer forced to take a spray-and-pray approach to getting our messages heard in the noisy world of social.

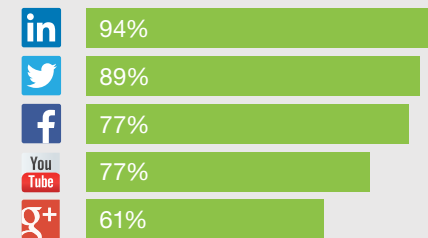
The technology is in place that allows us to adopt a much more refined approach — *sophisticated* if you will — to social media marketing, using the world's largest professional network.

Sources: "B2B Marketing 2016 Benchmarks, Budgets, and Trends — North America," Content Marketing Institute/ Marketing Profs. Webbiquity, 2013. "LinkedIn for B2B Lead generation" infographic, Oktopost as shared by business2community.com, 2014.

LINKEDIN BY THE NUMBERS

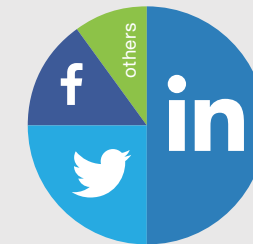
LINKEDIN IS THE #1 CHANNEL TO DISTRIBUTE CONTENT

B2B marketers who use various social media sites to distribute content:



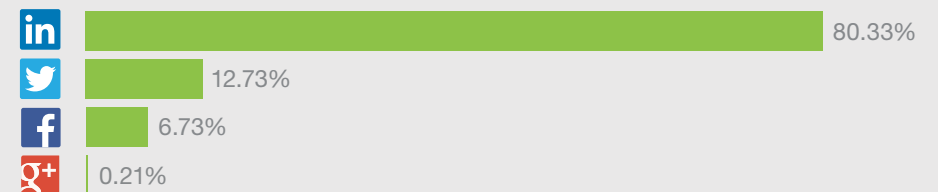
LINKEDIN DRIVES MORE TRAFFIC TO B2B BLOGS & SITES

90% of social traffic was driven by the big three networks, with half of it coming from LinkedIn.



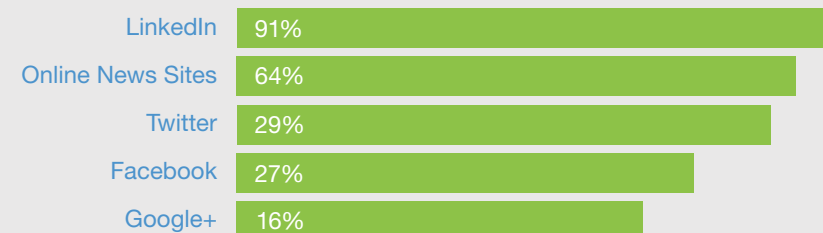
LINKEDIN CONSIDERED MOST EFFECTIVE FOR B2B LEAD GEN

80% of social media B2B leads come from LinkedIn.



EXECUTIVES RATE LINKEDIN HIGH ON VALUE GAINED FROM THEIR SOCIAL MARKETING INITIATIVES

LinkedIn is the number one choice for professionally relevant content.



CHAPTER 2

Market to Who Matters: Achieve Your Marketing Goals

As a sophisticated marketer, grasp the reality of today's purchase process: Buyers are up to 90% through the purchase process before they make direct contact with your sales team. That means the onus is on you to attract and engage these buyers by delivering content that helps them narrow down their options.

That's where the LinkedIn platform delivers value, by:

1. TARGETING

Creating awareness of your brand and products early in the purchase process

2. ENGAGING

Positioning your brand as a thought leader and engaging audiences more deeply with content as they're forming perceptions and decisions

3. OPTIMIZING

Driving the right audiences to take action, helping you generate quality leads and new business

GET TO THE RIGHT PROFESSIONAL AUDIENCE

With your specific end goal now in mind, our targeting is the core of what enables your success on LinkedIn. The authentic member-generated, first party data on LinkedIn is more accurate and highly differentiated in the market noise of audience data. We make it easy for you to segment and reach your audience by offering:

- **RICH DEMOGRAPHIC DATA**
Job Function, Seniority, Company Name, Geo, Industry
- **INTEREST-BASED TARGETING**
Group Membership, Skills, Field of Study
- **PERSONA TARGETING**
Job Searchers, Opinion Leaders, Mass Affluent, Business Travelers
- **YOUR OWN AUDIENCE DATA**
Target Account Lists, External Data Integrations

ENGAGE YOUR AUDIENCE WITH CONTENT

Based on your goals and the metrics you'll use to grade the success of your programs — and given how members engage on the platform — you can take advantage of a mix of organic content and paid advertising opportunities.

Our innovative products help marketers navigate the complex B2B buying process, where multiple touchpoints influence every sale.

"LinkedIn is the only platform that the majority of B2B marketers consider to be effective."

— "Content Marketing Research Report," Content Marketing Institute, 2016

CHAPTER 2

8 WAYS TO TAP INTO THE POWER OF LINKEDIN

Here are strategic marketing opportunities to better reach and nurture prospective buyers. We'll explore these in greater detail in Chapter 6 and Chapter 7:

ORGANIC

You can build your brand and content presence through:

1. YOUR COMPANY PAGE

Company Pages have evolved from a nice-to-have to a need-to-have. Through a Company Page, you can market your business to the LinkedIn community, telling your company's story and giving customers and prospects a place to learn about your business, your employees, and your brand.

2. SHOWCASE PAGES

By using Showcase Pages to create dedicated pages for your more prominent brands, businesses, and initiatives, you can extend your LinkedIn presence.

3. LONG-FORM POSTS

Using an intuitive blogging tool that seamlessly integrates with your profile on LinkedIn, you can publish new and previously published content on LinkedIn to quickly grow your audience and network.

4. CONTENT UPLOADED TO SLIDESHARE

SlideShare is not just a repository for your slide presentations. It's a social channel where you can establish your brand as a thought leader and authority around topics and keywords.

Nike
Sporting Goods • 10,001+ employees • Beaverton, OR

2 people from your company were hired here. See all 53,254 employees →

See jobs Follow 1,144,694 followers

Overview

Jobs
Alexandra Rynne
Millennial Marketer | Global Content Creator | Contributor, Social Media Examiner & Featured in Inc.

Life
CAREERS AT NIKE, INC.

PREMIUM
See how Nike is trending over the last two years. Get the full picture

About us
NIKE, Inc. named for the Greek goddess of victory, is the world's leading designer, marketer, and distributor of authentic athletic footwear, apparel, equipment, and accessories for a wide variety of sports and fitness activities. Operating segments for the NIKE Brand are, North America, Western Europe, Central & Eastern Europe, Greater China, Japan, and Emerging Markets. The wholly-owned subsidiaries include Converse Inc., which designs, markets, and distributes casual footwear, apparel and accessories and Hurley International LLC, which designs, markets, and distributes action sports and youth lifestyle footwear, apparel and accessories. The company was founded by Bill Bowerman and Phi Knight in 1972 and is headquartered in Beaverton, OR.

For more information, visit our company site: www.nike.com or our career site: www.jobs.nike.com

Specialties
Athletic Shoes, Apparel, Sports Equipment, Digital, Merchandising, Innovation, and Technology

Headquarters
Beaverton, OR

Company Size
10,001+ employees

Website
<http://jobs.nike.com/>

Industry
Sporting Goods

Founded
1972

Affiliated Companies

converse Converse Apparel & Fashion 87,644 followers

Hurley Hurley Apparel & Fashion 46,797 followers

Recent update
We are connecting the dots between basketball and street
See all updates

Company photos See all

Similar companies

adidas adidas Sporting Goods 10,001+ employees

1 company alumnus works here

adidas Group adidas Group Sporting Goods 10,001+ employees

CHAPTER 2

8 WAYS TO TAP INTO THE POWER OF LINKEDIN

PAID

As you start building your organic presence, in parallel, you can begin investing in a range of paid opportunities to reach the right people on LinkedIn and engage them at scale on mobile and desktop:

- In the LinkedIn Feed and beyond (Sponsored Content)
- In the LinkedIn Inbox (Sponsored InMail)
- Early in the purchase process
- Through other native ad formats (Dynamic Ads)

Extend the quality traffic of LinkedIn professionals to your own branded sites. Embedding calls-to-action in your creative on LinkedIn ensures the flow of influential, affluent and educated professionals to your own online properties.

5. LINKEDIN SPONSORED CONTENT

Delivering your content directly into the LinkedIn feed, this allows you to capture people's attention where they're most engaged: while consuming information shared with them by their professional network. Sponsored Content is foundational and arguably LinkedIn's most versatile product; you can design your program to serve branding and awareness objectives, along with direct response and lead-generation goals.

6. LINKEDIN SPONSORED INMAIL

The most direct way to engage your prospects on LinkedIn, this is a game-changer in terms of taking email marketing effectiveness to the next level and driving tangible metrics including leads, cost-per-lead, and pipeline. You do that by delivering targeted, personalized messages and content right into prospective customers' LinkedIn inboxes.

7. LINKEDIN TEXT ADS

These are a powerful way to make sure you get on the radar early and build your brand with the right audiences — in the premium context of the world's largest professional network.

8. LINKEDIN DYNAMIC ADS

Dynamic Ads (e.g., Follow Company, Spotlight) empower you to accurately target your audience with highly relevant and customizable creative on LinkedIn.com. Because this dynamically generated ad format leverages information from LinkedIn member profiles, it is highly engaging and very effective at driving traffic to your website or Company Page.

CHAPTER 2

Ask the Expert:

Brian Clark



**Founder and CEO of
Copyblogger Media**

LI: Do you regularly check your feed? If so, how do you use it?

BC: I've just started following the Marketing Strategies category within my feed and it's a treasure-trove of content all in one place. This has become a great resource not only for staying up-to-date on the latest ideas from others, but it also fuels our own content-sharing on other social networks.

LI: What's your best advice for writing a compelling Company Page update?

BC: Tell a story. And more importantly, relate that story back to your ideal prospect's problems or desires. Even if the story focuses on the founding, evolution or growth of your company, make sure people understand that all of those great things happened because of the value you provide your audience, customers, and clients.

LI: How can a business best take advantage of LinkedIn for lead generation?

BC: LinkedIn, unlike Facebook and Twitter, is all about business. The mindset and intent are naturally more receptive to solving business problems than the kind of socializing and sharing that happens elsewhere.

That said, you still have to lead with value to generate qualified leads. LinkedIn's focus on content marketing has primed the

audience to expect information and insight first, and then a call to action that takes the relationship to the next level. For those who have been doing content marketing from their own sites for years, LinkedIn becomes an essential outpost for that content, mixed with in-person engagement.

LI: Where do you see LinkedIn in 5 years?

BC: LinkedIn appears to be all in on becoming a true media company. I've heard some grumblings from early LinkedIn fans that the company and site are losing the singular focus it started with, but I see it differently. A business education hub of the sort LinkedIn is building can only increase the value of the ecosystem.

LI: What's something that's not in your LinkedIn profile?

BC: I've made no mention of the fact that I used to practice law in my LinkedIn profile. Some people may still hold that against me.

CHAPTER 3

Optimizing Your Profile

Every day, we see millions of professionals find others and get found through LinkedIn search.

Whether someone is searching for people, jobs, companies, or groups, we provide the most relevant results based on your professional identity, your network, and how the people in your network engage with LinkedIn. Plus, one of the first steps many members take when receiving content from a company or another member is clicking through to the personal profile or Company Page to learn about the sender. That's why it's critical for you and your company to maintain complete and optimized profiles.

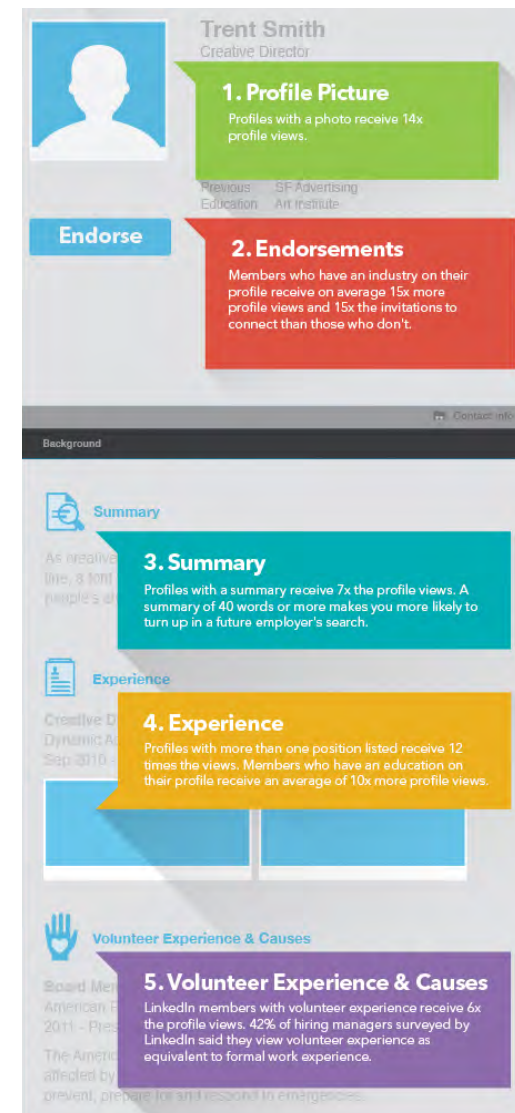
HOW YOU CAN BENEFIT FROM AN OPTIMIZED PROFILE

As a marketer, you can use LinkedIn for networking and to further your profession. After all, these days, very few people end up working for a single company their entire career. So whether you're actively seeking a new position or maximizing the job you are already in, it's wise to make sure your profile is set up for maximum exposure and engagement. In addition, adding rich media content — such as SlideShare presentations, videos, and infographics to your profile — is a fantastic way to showcase visual assets to profile visitors.

HOW YOUR COMPANY CAN BENEFIT FROM AN OPTIMIZED PROFILE

It goes without saying that your company and all of its employees should optimize their LinkedIn profiles. After all, an optimized profile can boost the visibility of your company and its content in the search results — both on and off the network. That's because search engines like Google scour pages and URLs for keywords, and LinkedIn profiles offer many opportunities to embed keywords, such as within the LinkedIn URL, other URLs you list within your profile, job titles and descriptions, and content links you include. So if your company and its employees have optimized their profiles, you could very well gain an advantage when prospective customers are searching for companies, products and services like yours.

This infographic highlights all the opportunities for getting the most from your profile.



CHAPTER 3

Ask the Expert:

Shane Atchison



CEO of POSSIBLE

LI: What factors are most important to you when considering advertising channels for your clients?

SA: Our top ones include audience concentration and relevance, segmentation and targeting functionality, and the ability to extend or amplify channel content across other owned and earned properties. We also leverage our social listening and marketing sciences technologies to identify opportunities for the brand within each channel and with each audience.

LI: What types of clients should be leveraging LinkedIn more than they currently are?

SA: I think that clients with investments in content are missing a massive opportunity to leverage their LinkedIn presence. They could use LinkedIn in combination with their owned properties to precisely target, share, and then realize return on their content investments. But for this, they need a comprehensive strategy that integrates the LinkedIn platform, their content and their CRM efforts.

LI: What is the risk of a client not having a company presence on LinkedIn?

SA: The biggest risk, especially for B2B, is a loss of discoverability. LinkedIn is becoming the de facto starting point when searching for partners and evaluating solutions. A thoughtful LinkedIn presence is not only a great opportunity to increase your visibility as an individual. Corporations can also use it to turn both their workforce and followers into brand ambassadors.

LI: How are your clients' marketing objectives different on LinkedIn compared to other social networks? How does that impact your clients' content strategy?

SA: Most social networks only serve opportunities at the top of the funnel and provide limited ways to engage. You can tailor the LinkedIn platform to each client's marketing objectives and use it as part of a larger content strategy. The platform makes it easier for brands to serve audiences with content tailored to the individual — both in terms of depth and timing. This makes content smarter and relevant at scale. As a result, it can drive engagement lifecycles rather than one-off opportunities.

LI: How do you compare the audience-targeting capability of LinkedIn with other social networks?

SA: There are three major ways LinkedIn data is better for targeting: Recency, authenticity, and standardization of data. Recency means that people tend to keep their LinkedIn profiles up to date — something they rarely do on other networks. Authenticity means that they

are who they say they are. You can't put a fake job title up on LinkedIn. And the standardization of user-generated data makes it easier to analyze and integrate the platform into your content strategy.

LI: How are marketers getting it wrong with LinkedIn?

SA: They think of it simply as a hiring, prospecting, or one-dimensional advertising platform. It's actually a versatile content platform with precise data that can be integrated into a variety of programs on and off the site. For example, B2C brands often miss the opportunity LinkedIn provides to enhance or expand distribution networks or channel partner communication plans. They also miss the opportunity to build programs around LinkedIn that leverage content to drive engagement lifecycles and stimulate organic community-building. The platform's capabilities in this area are unmatched and underutilized.

CHAPTER 4

Expand Your Network of Influencers

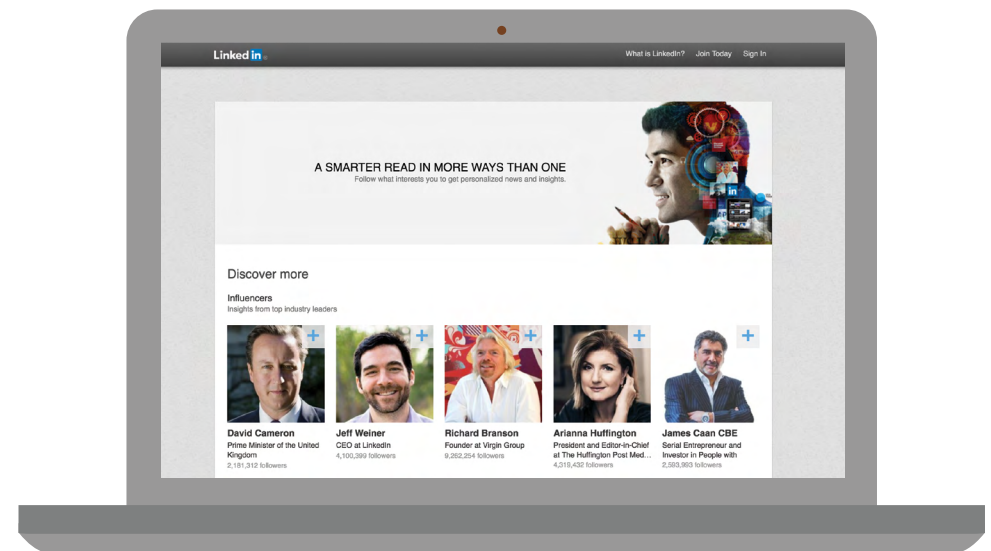
In late 2012, we made it possible for any LinkedIn member to follow an exclusive group of Influencers on LinkedIn. From C-level executives and entrepreneurs to world leaders and philanthropists, these Influencers contribute unique business insights and spark thought-provoking discussions on a range of issues. Displayed via the LinkedIn feed, the Influencers program is a source of truly original content. But more importantly, it's meant to inspire, inform, and make you a better marketer.

The Influencer program numbers 500 of the most influential thought leaders. Posts that our Influencers write on LinkedIn garner on average more than 25K page views, more than 300 likes, and 100 comments. And you can directly engage with any of these Influencers, either by “Liking” a post or jumping into a conversation about a post. Moreover, through threaded comments, you can reply to a post by an Influencer to start conversations and debates with others who are reading that post. You can mention other people to draw them into a discussion, and get notified when your comment has received a response.

“It thrills me to see LinkedIn gaining ground as an interesting place to hang out. I’ve long held that LinkedIn is the dark horse of the social media platforms — or, at least, it’s the workhorse of the bunch.

If Twitter is where you go to meet people you don’t know and Facebook is where you go to talk with people you already know, then LinkedIn is where all of you can meet up to get stuff done together.”

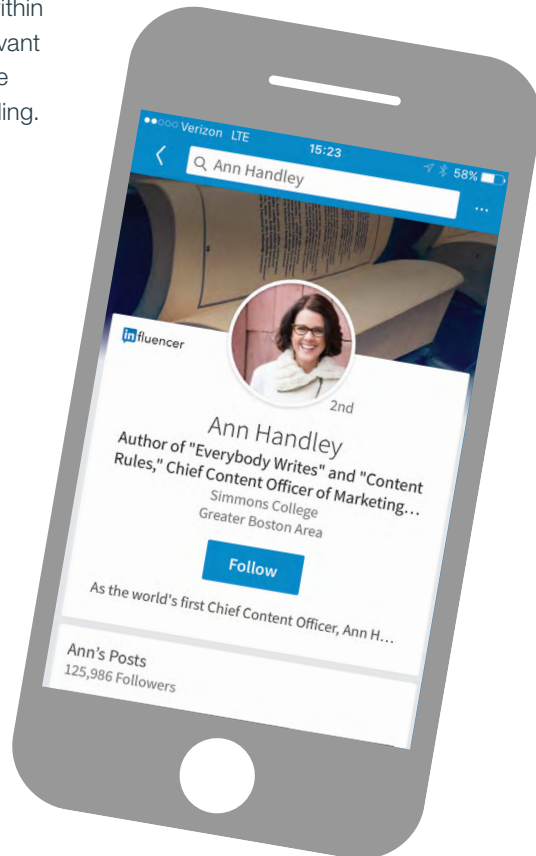
— Ann Handley, Author of Content Rules, Chief Content Officer at Marketing Profs



CHAPTER 4

Follow Influencers Without Being Connected to Them

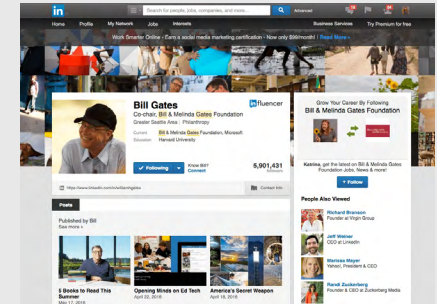
In addition to joining in rich conversations, you will see which Influencers and topics are driving the most interest — perhaps sparking an idea of your own for a post or content asset. Plus the ability for LinkedIn members to like and share Influencer content lets you quickly find out what the people in your network are reading and reacting to, helping you unearth new ideas. Want to broaden your horizons? Take advantage of discovery modules within LinkedIn to help you find more relevant content based on the people you're following and the posts you're reading.



CONSIDER THESE EXAMPLES

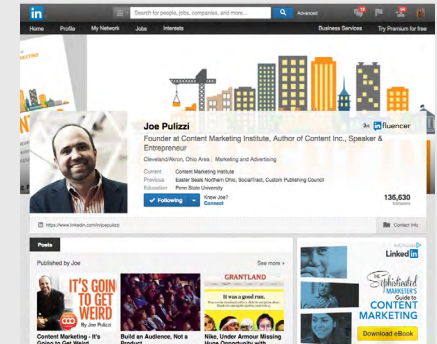
6,000,000+ FOLLOWERS

Bill Gates is an Influencer with over **6,836,041** followers. One of his posts garnered over **1.9M** views, more than **11K** thumbs up, and over **4000** comments.



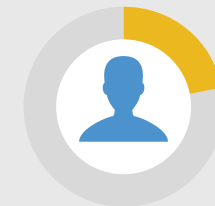
188,000+ FOLLOWERS

Joe Pulizzi, a speaker, entrepreneur, author, and founder of Content Marketing Institute, has over **188,000** LinkedIn followers. One of his posts pulled in **138K** views, **800** thumbs up, and over **200** comments. It's easy to be part of such a rich discussion!



The average Influencer post garners nearly

30,000 VIEWS



22% are entry-level professionals.



49% of influencer followers are director-level and above.

CHAPTER 4

Ask the Expert:

Viveka Von Rosen



LinkedIn Expert & Author:
"LinkedIn Marketing: An Hour a Day,"
International Keynote Speaker,
Forbes Top 20 Most Influential

LI: What type of content best connects with audiences on LinkedIn? Is there a specific type of content you prefer to consume on LinkedIn?

VR: That's kind of an apples or oranges type of question, when it comes to LinkedIn. I'm a fruit salad gal myself!

LinkedIn Influencers and the LinkedIn Feed: First of all, LinkedIn truly understands the importance of good content. Right now it's the only social media site to have its own blogging platform fueled by the world's

thought leaders (LinkedIn Influencers). These people, most of them household names (best-selling authors, Fortune 500 CEOs, heads of state) create content specifically for LinkedIn. You can follow not only these Influencers, but also channels of content.

I think the LinkedIn feed is a great place to find relevant business content to share not only on LinkedIn, but other social sites as well. When a client needs a good business article to post to their Facebook page or Twitter, I can often find something relevant via my trending topics — quickly and easily. So my LinkedIn feed gets more of my attention than any other RSS feed or news aggregator I use.

LinkedIn Update Mentions: As long as you are connected to a person or following a company, you can share their content and mention them in an update.

I wish I had the time to check on my homepage every hour and read all the updates from every one of my 29K+ connections, but I don't. (And to be honest, I wouldn't want to!) Chances are, you don't either. So I rely on LinkedIn Status Update mentions and LinkedIn's new(ish)

Notifications tab to see what people are saying about me, what content of mine they are sharing and their comments on my updates. So while I don't listen to ALL updates, I listen to the ones that involve me in some way.

GROUP CONTENT

For (soft) market research, consider LinkedIn Groups. Groups are full of like-minded, targeted audiences. Ask questions. Ask for help. Occasionally share an article you like. I love the content and interaction on some of my Groups, and I know I can always go there to get quick answers to my questions and find out the latest and greatest in the sales world.

It just takes some time to find these good groups. I recommend asking your network what groups they like and why. (For instance, I am a raving fan of Jill Konrath's Group, Fresh Sales Strategies, because it always offers fabulous ingestible content).

LI: How do you make sure personal time spent on LinkedIn is productive? How does this differ from other social networks?

VR: LinkedIn is probably less likely than some of the other social sites to suck you into the rabbit hole of singing cats and surfing dog videos. But messages, updates, and Groups can certainly suck you in. It's usually all good stuff and relevant to your business which means you might even spend more time there since it's "allowed." I recommend scheduling your LinkedIn (and other "social") time to make sure you have a start and stop time. I also suggest you create a checklist that covers everything you need to do on LinkedIn (monthly, weekly, and daily).

LI: How are marketers getting it wrong with LinkedIn?

VR: Basically marketers do these three things wrong:

- Selling too much
- Not making use of the tools
- Not realizing its potential

SELLING

I always tell people you will never sell your *stuff* on LinkedIn. The likelihood of someone seeing an update you have posted on how you sell the best gadget and then buying

CHAPTER 4

Ask the Expert:

Viveka Von Rosen

it is unlikely. LinkedIn is about creating relationships with people. Once you have established a connection and are moving from the “know” each other to the “like and trust” each other level of engagement — only then do you have a good chance of sharing your products and services with someone likely to purchase them. But these relationships take effort and nurturing. Establishing that sense of “like and trust” might seem like a lot of work, but the payoff can be monumental. Getting people to buy from you on LinkedIn means a time investment, but to me it is well worth it.

TOOLS

LinkedIn has so many cool little tools. My favorite is their “Sharing Bookmarklet.” To find the Sharing Bookmarklet, you just come down to the “Tools” link and then on the right hand side click on the tab that says “Sharing Bookmarklet.” Drag the Bookmarklet button up to your browser bar. Then no matter what web page you’re on, all you have to do is click on the ‘share on LinkedIn’ link and you can easily share that page.

Not all websites are LinkedIn-centric. So if you find a website, blog post, or article that doesn’t have the LinkedIn share button, you can still share it by clicking on the “Share on

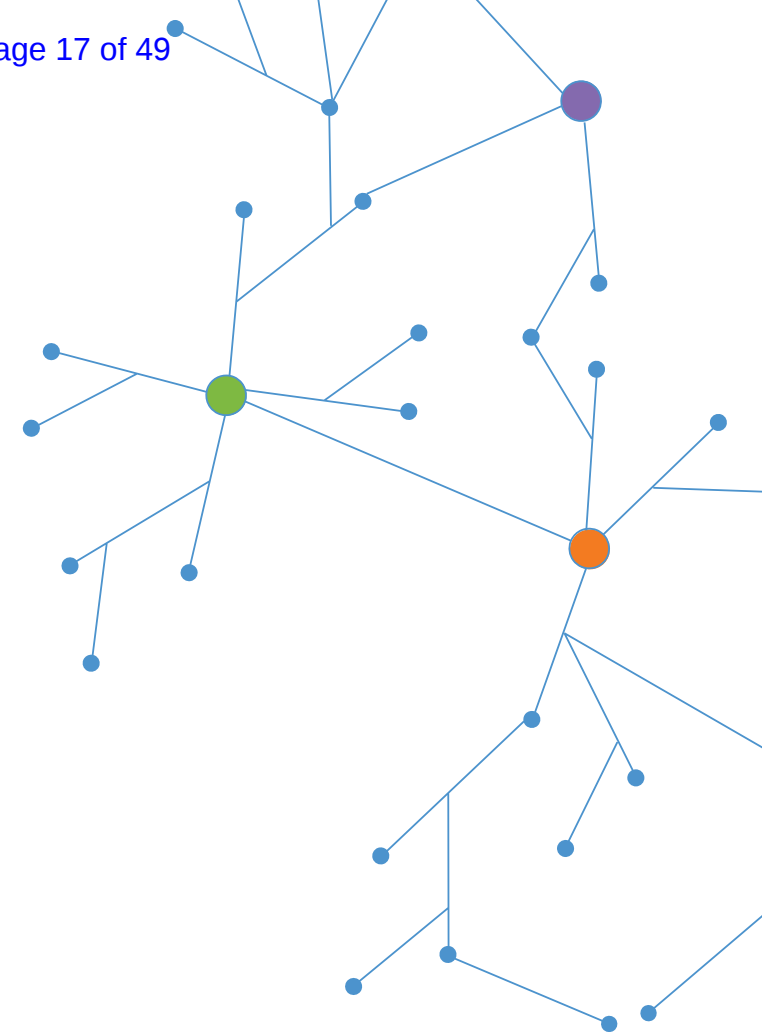
LinkedIn” button. You can post the page as an update or as a tweet. You can post it to your Groups by clicking the Group option, then typing in the name of the LinkedIn Groups you wish to share the post with. You can even send it to an individual.

This is a very quick and easy way to post helpful, useful, and interesting content with your network. These updates will show up on your connection’s homepage as well as in your profile under “Activity.”

POTENTIAL

Hopefully some of the things I have mentioned will open a few eyes to the potential of LinkedIn. There is just so much you can do with it. It is a completely under-utilized tool from Groups to Company Pages and beyond. But I guess that’s why I have a job! If you have questions about how it can help with prospecting, lead gen, relationship building, and top of mind awareness, please feel free to reach out to me!

www.Linkedin.com/in/Linkedinexpert



CHAPTER 5

Keep up with what matters

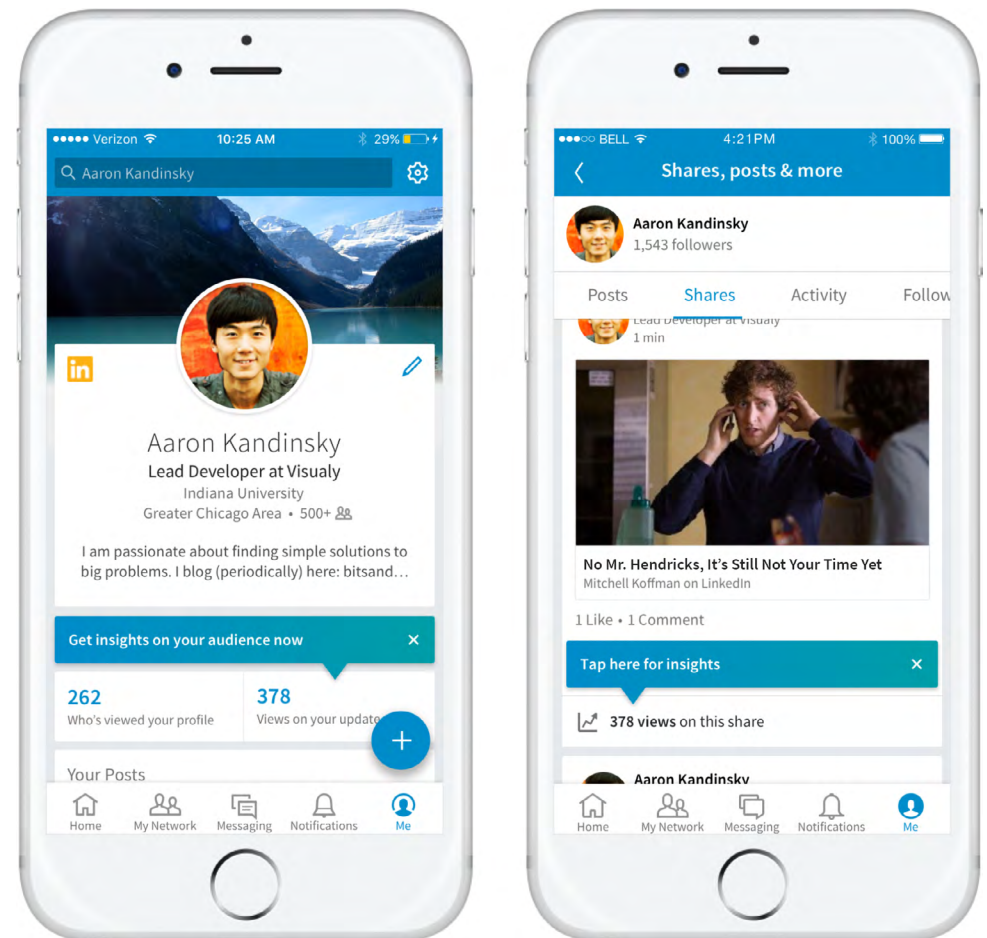
With all the news websites, blogs and newsletters out there, staying in the know can be time consuming.

In fact, like most marketers, you probably find it's increasingly difficult to figure out what matters most when reading news across multiple sources. Millions of professionals invest their time on LinkedIn, staying on top of industry news with the homepage feed.

Your LinkedIn Feed is designed to help you discover and discuss news and ideas to help you stay well-informed so that you can be more successful every day. It is personalized for you based on your profile and relationships in order to surface topics you care about from people who matter in your professional world.

Discover New Professional Content

We've not only improved the overall search functionality with faster auto-complete suggestions, but we've also made it easier for you to find "What's New" across timely world events and what's trending among professionals like you worldwide.



CHAPTER 5

CUSTOMIZE YOUR LINKEDIN FEED TO SEE THE NEWS AND CONTENT YOU CARE ABOUT

On the LinkedIn mobile app, you can tailor the content in your feed by tapping on the control icon on the top right corner of any update and going to “Improve my feed.” From here you can discover new industry leaders, publications, and companies to follow, and we’ll automatically deliver news and updates that you want to see. This feature is coming soon to desktop, but any updates you make on mobile will be reflected in your feed, no matter where you access it.

NEVER MISS AN INTERESTING ARTICLE AGAIN WITH “SAVE FOR LATER”

As you scroll through your LinkedIn feed, you’ll notice that on the bottom right of every article, there is now a bookmark icon that allows you to save that article for later. We know you’re always on the move — running between meetings, waiting in line for coffee — and sometimes you just don’t have time to delve into an interesting but lengthy article right then and there.

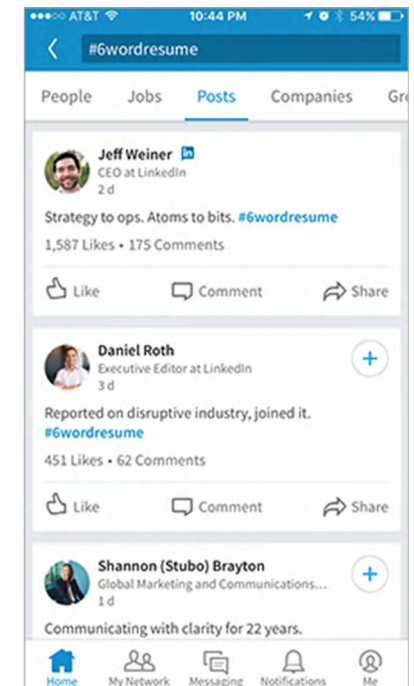
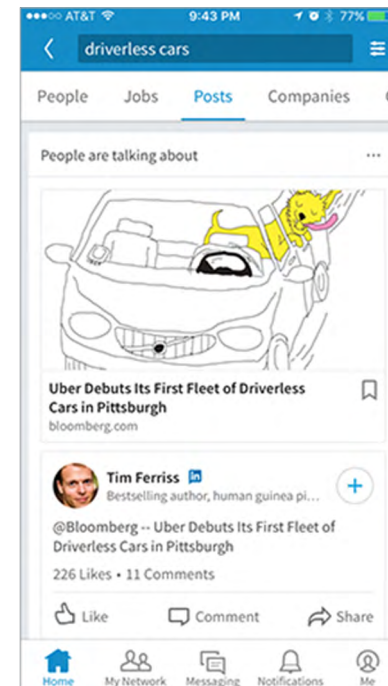
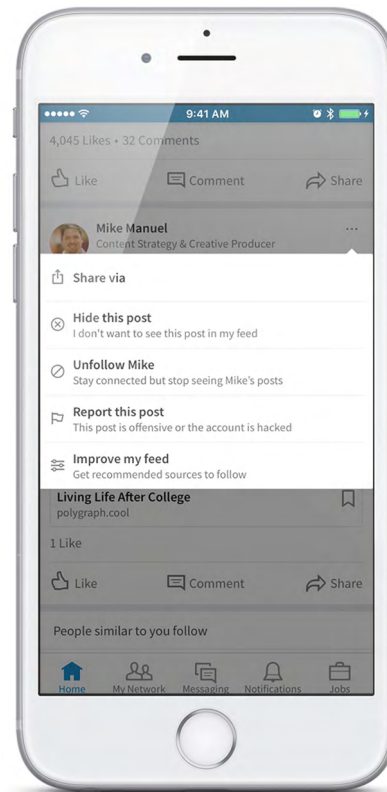
Just tap the “Save for Later” icon to ensure you’ll never miss content that matters because you forget to revisit it later. Everything you want to read will be neatly stored away, under the “Me” tab, with a single tap under saved articles for viewing when you actually have the time to read.

USE SEARCH TO EXPLORE TOPICS YOU CARE ABOUT

Type a topic into the search bar at the top of your feed and then use the “Posts” filter get the latest conversations, ideas, and diverse perspectives of your peers and other industry experts all in one place.

TAP INTO HASHTAGS

Hashtags included in posts are now tappable and lead to search results so that you can discover other posts with the same hashtag. Simply add a hashtag to your post and it will be automatically available publicly, or if you want it to be only visible to your connections you can easily change your sharing settings (more on privacy below). As you would expect, you can also search for a hashtag to see all public posts tagged with it.



CHAPTER 5

Ask the Expert:

Lee Odden



CEO @TopRank Online Marketing,
Author: "Optimize,"
Public Speaker: Integrated Search,
Social, & Content Marketing

LI: Do you regularly check your LinkedIn feed? If so, how do you use it?

LO: I check LinkedIn daily, follow a number of thought leaders and also look for news stories my network is engaging with. The feed offers content that I can interact with through liking, commenting, sharing on LinkedIn or curating to our broader community.

LI: What's your best advice for writing a compelling Company Page update?

LO: This might seem like a cart and horse situation, but it's important to have an audience. Updating a Company Page to 2 followers vs. 200 just isn't the same. As with any other publishing platform, think of who your network is and what they're interested in. What do they expect? Giving people what they want in the form of useful content, tips, and information about changes at your company is a great way to attract more followers and better engage those you already have.

From a writing standpoint, write snappy, compelling titles. Check ubersuggest.io for popular keywords, and consider using specific phrases in the title and description — but only if they make sense and add value to the message. You can attract more followers to your LinkedIn Company Page through search on LinkedIn as well as organic search.

LI: How can a business take advantage of LinkedIn as part of a content marketing strategy?

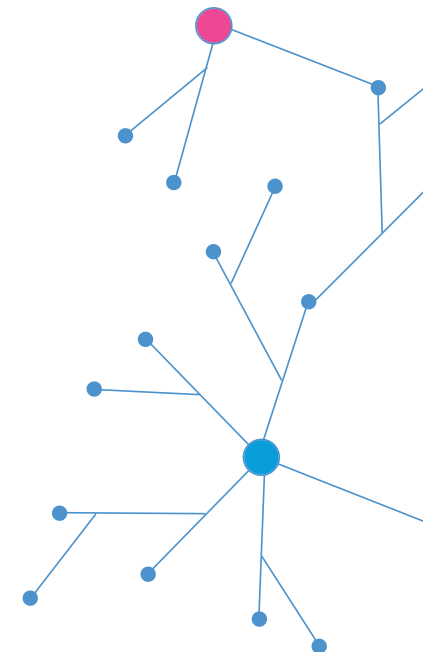
LO: Content participation on any social network or web platform should be informed by a company's business and content marketing strategies. Are customers there, and what are they doing? What are they interested in? What opportunities are there for the brand to be valuable to those prospective customers?

For most companies that sell into the business market, participating on LinkedIn should be a no-brainer. The specific way LinkedIn is used depends on the company, industry, and product mix. It also depends on what kinds of opportunities there are to be "the best answer" on LinkedIn for the things customers are interested in.

AT A MINIMUM:

- Ensure executive LinkedIn profiles are filled out and optimized.
- Make sure the Company Page is robust.
- Curate useful news as status updates and on the Company Page.
- Use LinkedIn as a follow up after meeting people online and especially at offline events where business cards are exchanged.

Beyond that, LinkedIn's social network platform provides many opportunities to engage with prospects, support individual and brand thought leadership, and connect with other groups like industry media and prospective employees. Whether it's targeted advertising or curating a mix of industry and company news on the brand page, companies that want to attract and engage other businesses need to be on LinkedIn.



CHAPTER 6

Build Your Brand and Company Presence Organically: Content Marketing on LinkedIn

By delivering relevant content, you can organically build your brand and company presence and your relationships with targets. LinkedIn provides the following solutions for delivering relevant content to our members:

- Your LinkedIn Company Page
- Showcase Pages for product or thought leadership content
- Publish long-form posts
- SlideShare

Company Pages are where you can catch the eye of prospective customers by featuring thought leadership content or anything else that would be relevant to your target audience, including links to your latest and greatest whitepapers, e-books, case studies and how-to content. By delivering useful and engaging content, you'll foster engagement and help your message spread faster.

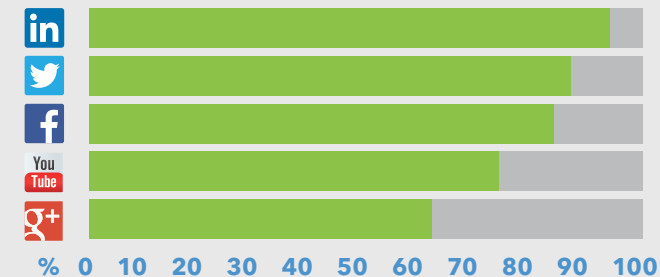
And remember: Integration with common social media management vendors — including Adobe, Hootsuite™, Percolate, Salesforce, Shoutlet, Spredfast, and Sprinklr — makes it easier for you to manage your Company Page.

Mobilize Your Employees to Amplify Your Message

Best-in-class companies encourage their own employees to share content on LinkedIn with their networks, significantly increasing content reach. This is especially powerful for companies whose sales reps are connected to the right decision makers.

LINKEDIN: A KEY PLATFORM FOR B2B CONTENT DELIVERY

LinkedIn continues to be the #1 channel to distribute content.



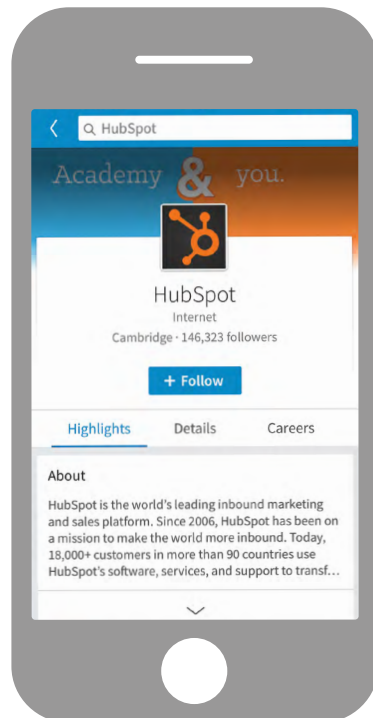
Source: B2B Marketing 2016 Benchmarks, Budgets, and Trends — North America, Content Marketing Institute / Marketing Profs

CHAPTER 6

Showcase Pages: Demonstrate Thought Leadership with Specific Audiences

Like many companies, you likely consider many parts of your business as important. And to give each its due attention, you likely have more than one “voice.” With Showcase Pages, you can build a presence and present a unique voice for every important part of your business. By creating dedicated pages for your more prominent brands, businesses, and initiatives using Showcase Pages, you can extend your LinkedIn presence.

In other words, you can create a distinct platform for each aspect of your business that has its own message to share with its own target audience. It’s a unique way to directly engage the right people in the right context. And just as with Company Pages, your administrators will be able to monitor performance through dedicated analytics tools within the Showcase Page experience.



5 Steps to Engaging Followers on LinkedIn:

1. Establish your presence

2. Attract followers

3. Engage followers

4. Amplify through the network

5. Analyze and refine

“When I ran marketing at a mobile startup, we routinely compared the impact of each channel at each funnel stage. We plotted channels along two dimensions: volume of names and cost per lead. LinkedIn topped all other lead sources, across both dimensions, and at every stage of the funnel. When it came to content distribution and lead generation, LinkedIn quickly became the first dollar budgeted each quarter.”

— Joe Chernov, VP of Marketing at InsightSquared

CHAPTER 6

Attract More Followers

The more the merrier on the social merry-go-round. Here are some simple, effective strategies for attracting more followers with your company updates:

- Engage your colleagues. A study by BrightEdge found that 9 of the top 10 brands with the most followers on LinkedIn have at least 60% of their employees on LinkedIn.
- Cultivate a larger following with a multi-channel approach. Encourage your teammates to add a link to your Company Page in their email signatures. If needed, ask your designer for help creating a customized banner or button.



Did You Know?

There are more than 2 million unique publishers actively using the LinkedIn Share button on their sites to send content to the LinkedIn platform.

“Content marketing is the planning, creation, promotion, and measurement of content to a target audience with the goal of satisfying customers and affecting a business outcome. LinkedIn offers an incredibly useful platform for research, ideation, and the amplification of content to specific interest groups from your target customers to the Influencers that inspire them to take action. LinkedIn is essential for achieving content marketing results.”

— Lee Odden, CEO @TopRank Online Marketing, Author: *Optimize*, Public Speaker: *Integrated Search, Social, and Content Marketing*

CHAPTER 6

Take Advantage of Publishing On LinkedIn

Get noticed by your peers and engage with like-minded professionals by writing your own posts. Publishing on LinkedIn gives all professionals the ability to share their expertise with the world.

MAKE YOUR CONTENT STAND OUT WITH MULTIMEDIA

Engaging content goes a long way in reaching the right audience, so we recently made enhancements to our publishing platform so that it's even easier for you to create posts that catch readers' attention.

In addition to a new interface that puts your content front and center, you can now more easily move, add, and resize multimedia with inline images, videos, slides, or podcasts. Research shows that articles with images get 94% more total views. All you have to do is click on the "Add Multimedia" icon.

ADD HASHTAGS TO HELP YOUR CONTENT GET DISCOVERED

To help surface your posts in front of the people who matter most, always add relevant hashtags so that others can easily find your content in search. Using a hashtag will ensure that when members are looking for information on a certain topic or timely event, your article will come up as one of the options.

GET AUDIENCE INSIGHTS ON THE GO

With our new audience insights on mobile (desktop coming soon), we've made it easier for you to understand who's seeing the posts you've shared and the articles you've written. To use the insights feature, simply tap on "Me" in the LinkedIn mobile app, and you will find real-time information on the posts you've shared the articles you've written.

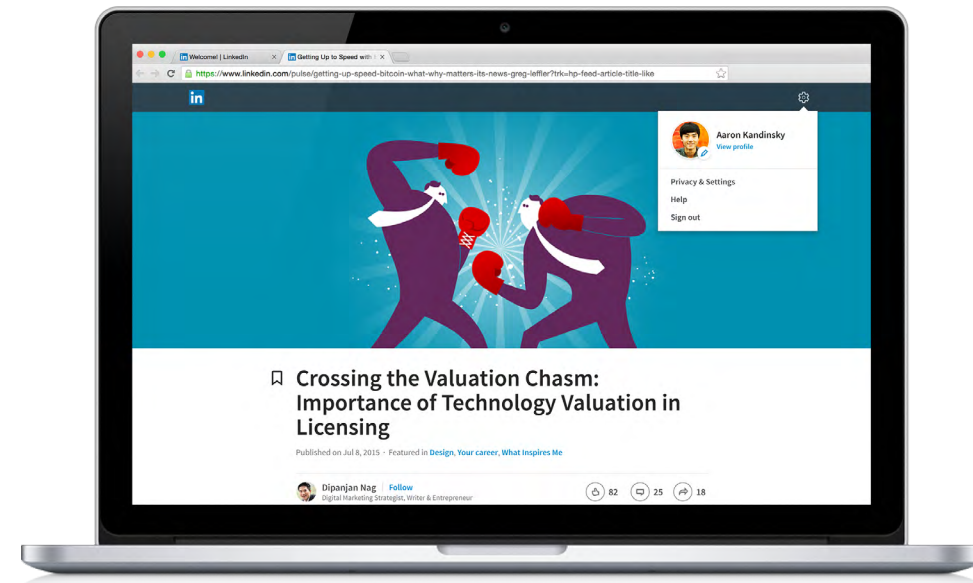
Now you can better understand your audience — what companies they work for, their job titles, where they live, and how they found your post. With these insights you can better understand if you were successful in optimizing your post to gain visibility with the right people.

Not only that, but these insights give you a simple entry point to connecting with people that are relevant to your industry, and start conversations that can make you more productive and successful in your career.

With nearly 3 million people publishing long-form articles and millions more sharing updates, LinkedIn is the leading platform for professionals like you to build your voice.

3 Reasons to Go Long on LinkedIn:

1. The content you publish is attached to and becomes a part of your LinkedIn profile, positioning you as an expert and thought leader.
2. You can create an always-on strategy with your C-level team, subject-matter experts, and employees by delivering your message with credibility and authenticity.
3. Your posts have the potential to be distributed in our trending topics and recommended to a much broader group of members.



CHAPTER 6

SlideShare: Tap into Visual Tendencies

We are all visual thinkers. In fact, 75% of the sensory neurons in our brains process visual information. Visual content can help set you apart from text-heavy competition, and SlideShare is the perfect channel for your visual content.

SlideShare is not just a repository for your slide presentations. It's a social channel where you can establish your brand as a thought leader and authority around topics and keywords.

THROUGH SLIDESHARE, YOU CAN:

- Share presentations, videos, infographics, and other documents with your LinkedIn network
- Upload portfolios, conference talks, PDFs, marketing/sales presentations, and more
- Embed videos in presentations, and add audio to make a webinar

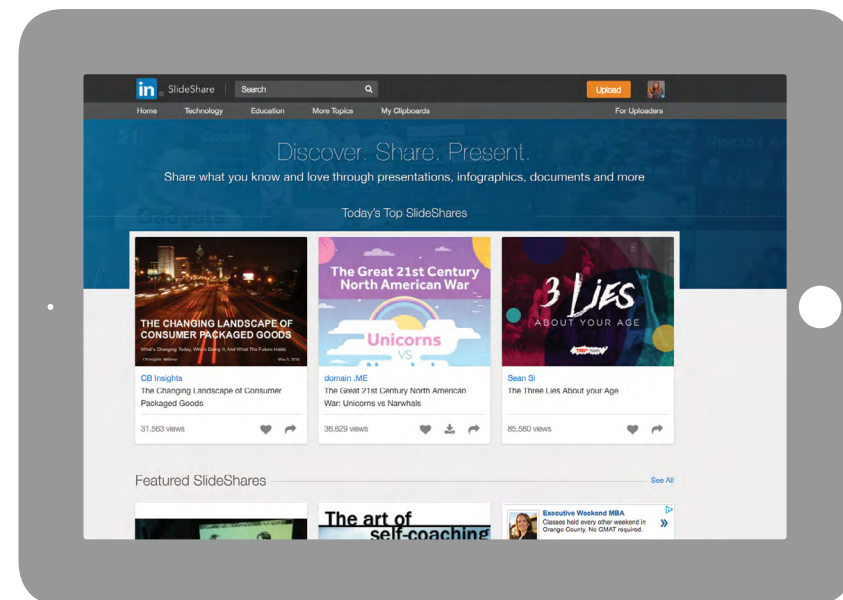
Each month, more than 400,000 new pieces of content are added to SlideShare, which hosts 70 million unique visitors monthly. On an average day, nearly 4 million people visit SlideShare (just on desktop!). That makes SlideShare the world's largest professional content-sharing community. And that's something you can't afford to overlook.

"It's almost not fair to ask for my take on SlideShare. I consider it one of the top three 'plays' in my own content marketing efforts. I contribute to the SlideShare blog. I recommend it to every one of my clients, and am hired often to write and design the presentations.

However, I'm biased for many reasons. Atop the list: SlideShare — and its integration with LinkedIn — accounts for a massive chunk of my website's traffic, has a lot to do with the authority I've gained in content marketing and copywriting for the web, and is helping to bring me all kinds of opportunities including new business, partnerships, and speaking engagements.

If you're not using SlideShare to distribute your content, you're missing out on, what, 60 million eyeball opportunities a month? And if you are, you know exactly how the service can align with your marketing goals."

— Barry Feldman, Feldman Creative



CHAPTER 6

9 Tips to Help Ensure Content Domination on SlideShare:

1. Keep your presentations short and sweet: Between 10–30 slides is optimal.
2. Be visual: Shoot for an average of 19 images in your 10–30 slides.
3. Get to the point: Aim for an average of 24 words per slide.
4. Be the authority on your topic: Choose a topic and own it.
5. Focus on design, and tell a story: Design your deck to pull the reader from one slide to the next.
6. Rev up the SEO for each presentation: Include keyword-rich titles, descriptions and tags in order to give your presentations a fighting chance in the world of search engines as well as inside the SlideShare search results.
7. Integrate your presentations into multiple channels: SlideShare easily embeds into landing pages and blogs and renders beautifully in Twitter.
8. Repurpose your presentations: Slice and dice them into blog posts, infographics, webinars, and videos.
9. Make SlideShare part of every campaign: Add a SlideShare checkbox to your campaign checklist.

If you don't have a SlideShare account, sign up from LinkedIn to share your presentations worldwide and drive more views and traffic.

Did You Know?

More than 30 million pieces of content are uploaded to SlideShare.
(February, 2016)



“In a recent conference, I was asked my opinion on what is the biggest opportunity in B2B Content Marketing. Without hesitation, I answered 'SlideShare.'”

— Michael Brenner, Vice President of Marketing Insider Group,
Speaker, Blogger and Social Business Marketing Leader

HAVE I GOT A STORY FOR YOU!

A good story captivates an audience. Think about your favorite book, TV show or movie; the plot and way it is told hooks you in. Now what if every presentation you sat through or gave was that spell-binding?

CHAPTER 6

Follow the 4-1-1 Rule

The 4-1-1 Rule was coined by Tippingpoint Labs and Joe Pulizzi of the Content Marketing Institute. While it was originally created with Twitter in mind, it can successfully be applied to your company's content marketing strategy using LinkedIn.

THE RULE STATES:

"For every one self-serving tweet, you should retweet one relevant tweet and most importantly share four pieces of relevant content written by others."

It's basically saying to share the love. Instead of constantly bombarding your followers with demos, webinars and whitepaper downloads, create a cadence of helpful insights relevant to your audience. Mix in a bit of industry thought leader content; news and trends are a great way to build relationships with prospects while keeping current customers in the know.

You'll authentically engage in conversations, build awareness and interact with LinkedIn members without giving the impression that you're a self-centered know-it-all. It's all part of moving to the new marketing mindset of "always be helping" instead of the outdated "always be selling."

Consistent posting: Create an editorial calendar of updates within your company, and highlight relevant third-party material. Then share it with company followers. Building a cadence around the 4-1-1 rule will continually add value for your followers.

Source: Tippingpoint Labs. www.tippingpointlabs.com

"Sell something, get a customer for a day. Help someone, get a customer for life."

— Jay Baer, *Digital Marketing Strategist, Speaker, Author and President of Convince & Convert*



4 New Tweets



1 Retweet



1 Self-Serving Tweet

CHAPTER 7

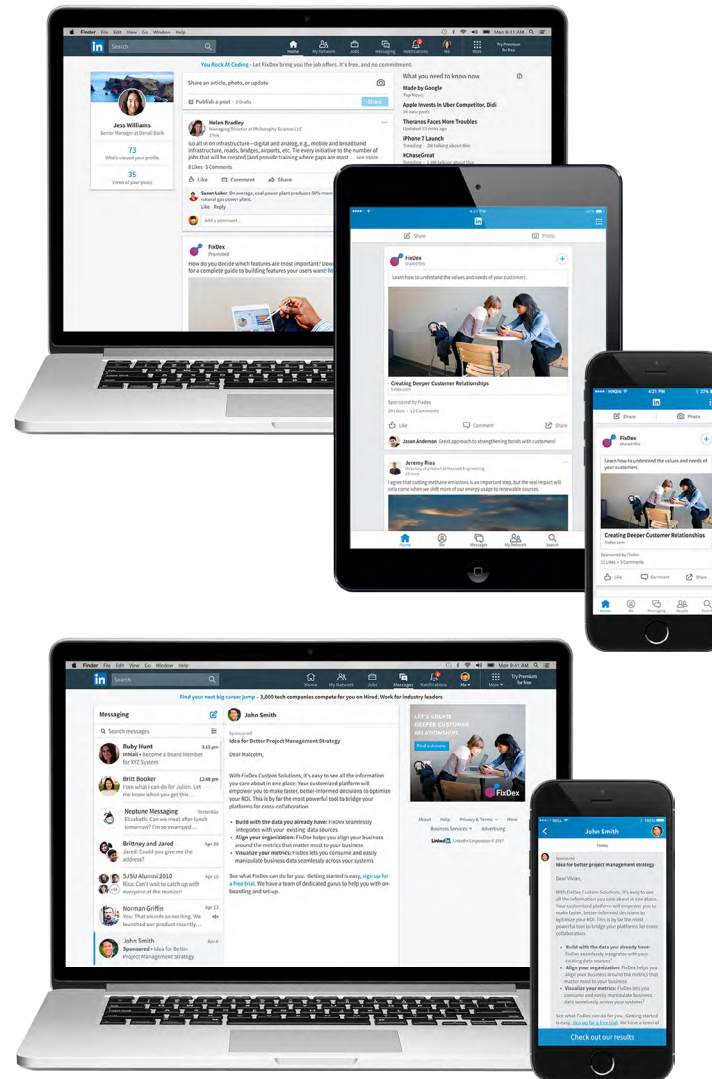
Expand Your Targeted Reach: Paid Advertising on LinkedIn

By combining mass reach with accurate targeting, LinkedIn advertising solutions enable you to:

- Engage your target from among the most affluent, influential, and educated audience on social media.
- Increase awareness, credibility and impact through the power of social proof.
- Drive traffic and leads to your site.

Here are the LinkedIn advertising solutions at your disposal to help you achieve those results:

- Sponsored Content
- Sponsored InMail
- Programmatic Buying
- Dynamic Ads
- Text Ads



CHAPTER 7

Sponsored Content: Appear in the LinkedIn Feed and Beyond

Our members are already engaging with high-quality content from news sites, thought leaders, their connections, and brands. With Sponsored Content, you can join the conversation and appear along with that content. You can publish Sponsored Content with rich media and ensure relevance with robust targeting functionality. And that means you can reach the right people at the right time with your best articles, images, infographics, PDFs, presentations, and videos. Plus, Sponsored Content is the only way to reach LinkedIn's mobile users at scale, since they appear in the feed on desktop, tablet, and smartphone.

SPONSORED CONTENT IS A POWERFUL TOOL TO:

- Raise awareness and shape perception. Send Sponsored Content to your target audience to rapidly increase awareness and shape the perception of your brand, products, and services.
- Drive quality leads. Generate quality leads by sharing insights that professionals seek. Watch that content spread via the peer sharing that occurs naturally on LinkedIn.

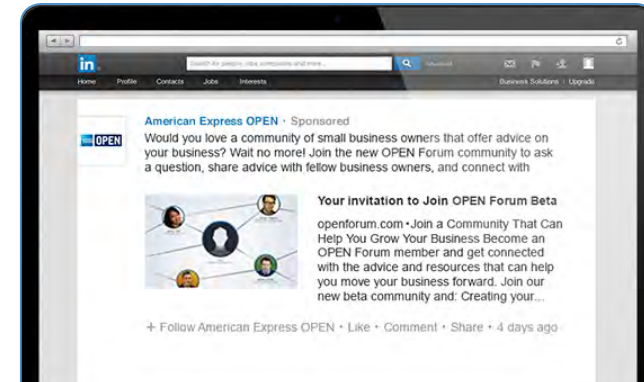
- Build relationships with the world's professionals. Publish your content with Sponsored Content to create value and establish trust that sparks ongoing conversations and deeper customer relationships.

TARGETING OPTIONS

Sponsored Content allows you to reach a targeted audience beyond your Company Page followers. You can define your audience using criteria such as location, company size, industry, job function, and seniority. Remember, there's always a tradeoff between targeting and audience size. If you target too specifically, your content may reach a very small audience.

PERFORMANCE TRACKING

You can promote content in 20 languages across the 200 countries and territories where we have members. Within a minute or two of publishing your update, you'll see impression and engagement metrics — and reporting on your post will be updated in near real time. That means you can track how well your posts hit the mark and fine-tune your strategy instantly.



Think of Targeted and Sponsored Content as Native Advertising

Sponsored Content is native to the browsing experience, incorporated directly into the member's feed so as not to interrupt the stream of content. That said, be sure to keep two to four Sponsored Content campaigns live at all times — that way you can appeal to members who are in the evaluation stage and still interested in high-level content, as well as those that are closer to a purchase decision.

Alteryx, an advanced analytics software company, generates quality leads at lower cost, using Sponsored Content to engage with targeted, premium audiences.

“With Sponsored Content we get the right kind of leads who are interested in relevant content we've created and in learning more about our product.”

— Rick Schultz, Senior VP of Marketing

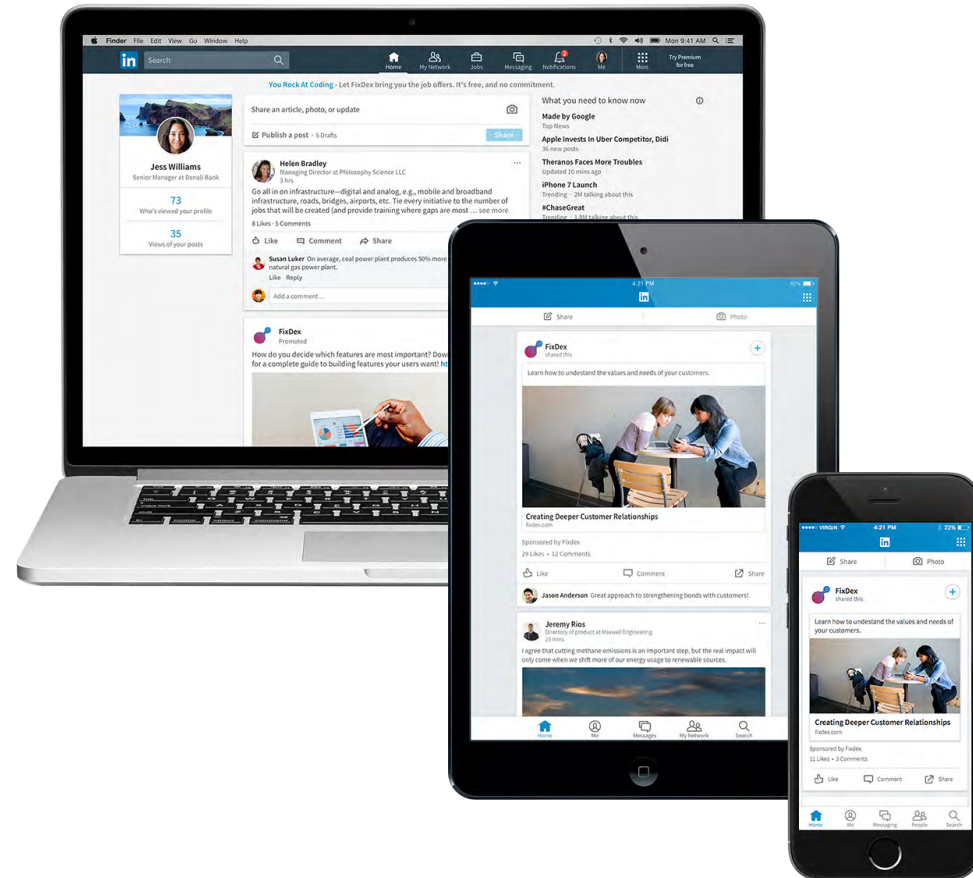
CHAPTER 7

HOW SPONSORED CONTENT WORKS

Getting a LinkedIn Company Page is the first step to using Sponsored Content. All Sponsored Content must first be created as organic Company Updates.

Similar to an ad unit, a Sponsored Content post can be viewed by members when they visit LinkedIn. Sponsored Content is clearly distinguished from organic content to make sure our members can differentiate between organic and paid content. Currently, they are labeled as “Promoted.” Links in Sponsored Content can drive traffic wherever you’d like, including your content portals, relevant news or articles, YouTube or SlideShare channels, whitepapers, and event registration forms.

Sponsored Content is purchased through a second-price auction. Here’s how it works: Each time there is an opportunity for Sponsored Content to be shown, LinkedIn runs an auction to determine which post to show. For any given auction, there can be many bids from competing advertisers looking to reach that member. That means when you sponsor content, your campaign enters an auction to determine whether it’s shown to your target audience. Sponsored Content inventory is non-guaranteed, but you may adjust your bid and content to perform better in the auction. Remember, because LinkedIn runs a second-price auction, if you win your bid, you’ll only pay one cent more than the second-highest bidder.



CHAPTER 7

Ask the Expert: Neal Schaffer



Author, *Maximize Your Social, Trilingual Social Media Strategy & Social Business Coach, Consultant, Trainer & Speaker*

LI: What type of content best connects with audiences on LinkedIn? Is there a specific type of content you prefer to consume on LinkedIn?

NS: The content that best connects with audiences on LinkedIn is undoubtedly the type that makes us do our jobs better as well as invest in our professional brand. Without a doubt, the recently added Influencer content is of the highest quality, but there is other great content to be found

in Network Updates as well as relevant Groups. It all comes down to content that is both relevant and timely — but deep as well.

LI: How do you make sure personal time spent on LinkedIn is productive? How does this differ from other social networks?

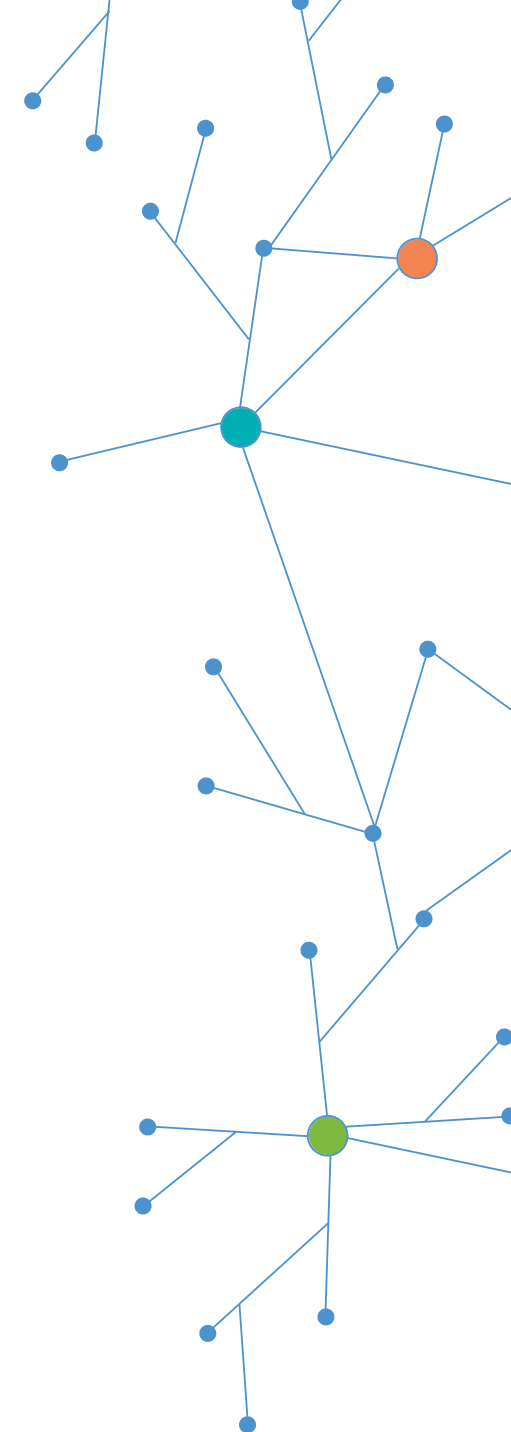
NS: I spend my personal time on LinkedIn in 2 ways: 1) Keeping up-to-date and engaging with my network, and 2) Business intelligence looking for information on people, companies, or news in my industry. I limit my time and remain clear on my objectives.

LI: What recommendations do you have for marketers looking to connect with target audiences on LinkedIn?

NS: LinkedIn, like any other social network, is about people that are using social media for communication with others as well as information gathering. Professionals are not looking to be sold to, but they are seeking out information that can help them do their jobs better. The best approach that I would recommend for marketers to connect with their target audience would look like a

combination of the following:

- Establish robust profiles that make you discoverable in LinkedIn's profile search.
- Share relevant content consistently from your personal profile.
- Reach out and connect with those from your target audience that you know but have yet to connect with.
- Proactively utilize your LinkedIn network for introductions to key people in your target audience, using LinkedIn Inmails when an introduction is not possible.
- Engage in relevant groups.
- Create a group to represent your company.
- Promote your LinkedIn Company Page, build up a follower base, and engage with them.
- Utilize Text Ads to help precisely connect you with your target audience.



CHAPTER 7

Sponsored InMail: Deliver Directly to Members' Inboxes

Using Sponsored InMail, you can reach high-value, targeted prospects on LinkedIn with attention-grabbing messages that speak directly to their interests. You can designate recipients by geography, job role, group membership, company size, and other criteria.

These notifications are prominently displayed on the LinkedIn homepage and in members' inboxes for high visibility that cuts through the clutter. Discover a new way to increase the effectiveness of your email marketing effort and drive leads from LinkedIn. Reach members only when they are active on the LinkedIn site to boost engagement.

SPONSORED INMAIL IS IDEAL FOR:

- Boosting conversions with targeted product and service promotions.
- Promoting content your audience wants to see, such as infographics, whitepapers, and reports.
- Personalizing invitations to events and conferences.

The flexible format makes it simple to integrate content and messaging from across your LinkedIn ecosystem. Accurate targeting ensures you reach the members that matter most, from across our network of over 467 million professionals.

A UNIQUE PRODUCT IN AN UNCLUTTERED ENVIRONMENT

- Mobile-optimized design for easy clicks: Persistent call-to-action button remains on top of content while user scrolls.
- Real-time delivery ensures timely reach: Sponsored InMail messages are only delivered when members are on LinkedIn.
- Uncluttered professional context: Strict delivery frequency caps ensure your message gets maximum mindshare.
- Flexibility to tailor your content: Send a personalized message that will resonate most with your target audience.

Send a personalized message directly to a member's inbox.

Engage your key target audiences across desktop and mobile.

Drive conversations by delivering personalized messages within the uncluttered LinkedIn inbox environment.

Sponsored InMail leverages the credibility of the LinkedIn platform so that they are more likely to be opened, read, and acted on — unlike conventional email campaigns.

“With so many competitors going after the same customers, VistaVu knew it was time to rethink its strategy. Our goal was to break away from the crowd by really demonstrating our industry focus and unique value proposition. For us, it was about getting our message and differentiated product offerings to the right audience. Not only did we receive more leads, but the quality and the promise of the leads was unmatched.”

— Nicole Baron, Marketing Manager, VistaVu Solutions

CHAPTER 7

Duke University Sees Sky-high Conversion Rates with Sponsored InMail

Duke University's Cross Continent MBA program offers a unique value proposition that can be difficult to convey through traditional ad formats. "Recruiting working professionals into our global programs has always been a challenge, because our concept is that you continue in your role while earning a world-class MBA," says Elizabeth Hogan, associate dean for global marketing at Duke. "Yet when high-potential professionals in emerging markets think about business school, they assume it involves quitting their jobs to do an MBA program in another country, or attending a local school in the evenings or on weekends."

The majority of applicants to the program in the past had come in from word-of-mouth referrals. However, Duke wanted to promote the program to new prospects in diverse global regions who would not have learned about it otherwise.

Hogan rolled out Sponsored InMails targeted by seniority, geography, and degree resulting in an open rate of **68 percent**, a **400 percent** increase in conversions, and a sales pipeline closure speed increase of **300 percent**.

"One of the extraordinary things about this InMail campaigns is that we have two students starting in August who had never heard of this program when they received our InMail in March. In the history of my marketing experience at his school, I've never seen us convert that quickly."

— Elizabeth Hogan, Associate Dean, Global Marketing,
Fuqua School of Business, Duke University



CHAPTER 7

LinkedIn Account Targeting: Tailor Your Sponsored Content or Sponsored InMail Campaigns to a Priority List of Accounts

LinkedIn's profile targeting combined with [LinkedIn Account Targeting](#) will allow you to market products and generate opportunities to the right personas within the accounts that matter most to your business. LinkedIn Account Targeting is available to customers purchasing Sponsored InMail and Sponsored Content through a LinkedIn account representative, and we plan to expand this to our self-serve customers over time.

3 Characteristics of a Top-notch Account Based Marketing Strategy

SALES AND MARKETING ARE IN SYNC

In ABM, marketing focuses on the accounts that matter most to the sales team, instead of casting a wide net with their lead generation efforts. That means more communication between the teams than most organizations are used to. It's useful to think of sales and marketing working together as parts of an "account team."

That means marketing focuses its budget on the accounts that sales deems most important, creating content specifically for these key accounts. Sales and marketing agree on a shared vocabulary, common goals, and metrics used to evaluate success.

MARKETING REACHES VERTICALLY AND HORIZONTALLY ACROSS TARGET ACCOUNTS

The traditional B2B sales approach is to focus on a few key decision makers. As the B2B buying process becomes more collaborative, that approach is less effective. Our research shows that an average of 3-5 departments are involved in purchasing decisions, depending on the industry.

For ABM, the goal is to target multiple departments within the account, with personalized content for each. Individual contacts are important, but need to be viewed in the context of the entire account.

In the new B2B buyer journey, vendors need to be known company-wide to have an impact. ABM accomplishes this by targeting a message at scale to the broader buying group.

CONTENT DEVELOPS TRUST AND SHARES KNOWLEDGE

Building and nurturing relationships is central to a successful ABM program. Our research shows that buyers are more likely to form a relationship with vendors who provide valuable consultation, education, and tools.

So it's important that your content plan has ample thought leadership content. There are three important considerations for creating content that demonstrates subject matter expertise:

1. Understand what stakeholders believe. Start with research into the existing state of the conversation, so you can meet your reader where they are.
2. Develop and articulate a well-informed point of view. Make a strong case for your position — make it clear that you have the authority to take a definitive stand.
3. Frame your story in terms of value delivered. Back up your viewpoint with real-world examples that demonstrate your ideas in action.

Ideally, you should have a unique value proposition and relevant content for each department that influences a buying decision.



CHAPTER 7

Ask the Expert:

Nate Stricker



**Agency Partner Manager at Pinterest
(Formerly Agency Lead at AOL)**

LI: What types of clients should be leveraging LinkedIn more than they currently are?

NS: Because of the association of the content on LinkedIn, as well as with the audience that goes to the site — any category where a client is aiming to make headway from a leadership perspective. If you're looking to make a leadership statement and/or be seen curating a point of view with content, there is a lot of upside to the LinkedIn proposition.

LI: How do you compare the audience targeting capability of LinkedIn with other social networks?

NS: With LinkedIn, with content generation, there's an opportunity with native content to be a bit more surgical with the data you have, and the kind of content you deliver — the holy grail of the audience and the content equation together. I think that's definitely an area where there is opportunity because no one network is especially nailing it right now.

LI: How are marketers getting it wrong with LinkedIn?

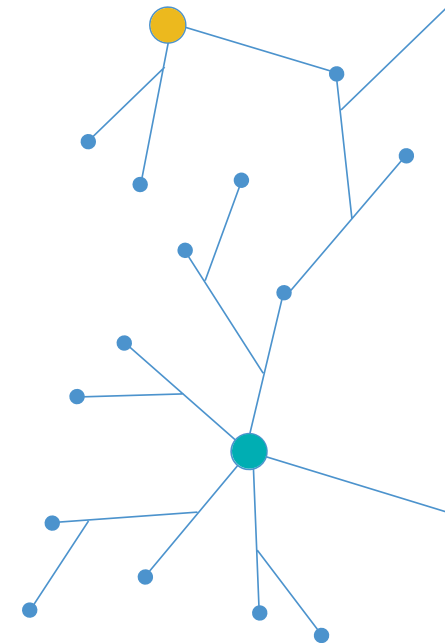
NS: There's still some education required. Even before being thought of as a media opportunity for advertisers, LinkedIn is viewed as a marketer's in-house PR firm — the PR mechanism, if you will. I think the first step is recognizing that it has quite a bit to offer from an advertising perspective. The second thing is that there are a lot of categories that could benefit from LinkedIn beyond the obvious ones. It's not just an environment for the Wells Fargos and the Bank of Americas and the University of Phoenixes of the world, but has huge

value for the GEs and the Geicos and the Chryslers, etc. I think that's a story that can be better flavored in the marketplace.

LI: How would you advise a marketer looking to create more “shareable” content? Are there specific strategies or specific tools you would recommend?

NS: From a tool standpoint, a really good social listening service can cover a wide swath of sources. It can also provide access to other media, search trends, and search behaviors so you have a rich tapestry to draw from in terms of what is relevant for consumers, particularly your target audience. Good listening is the first step. You're not going to create shareable content if what you're building is not relevant and intriguing to consumers. Sometimes it's a balance of what the advertiser wants to get across versus the passions that ignite the interest of the consumer.

The second part is having compelling content that leverages things like sight, sound, and motion to use the listening platform to find topics that have a currency to them. Then finally making it easy to share, so a user can choose to share in whichever platform they are most comfortable with.



CHAPTER 7

Programmatic Buying

We've also launched programmatic buying as a way to access LinkedIn Display Ads. This means you can now work with your preferred buying platform to buy highly visible ads that help you reach and engage the right buyers and build your brand in the premium context of LinkedIn.

Our goal with programmatic buying is to give you more flexibility in how you work with us, and expand the ways we can partner to meet your marketing goals.

HOW IT WORKS

You have the option to purchase our display ads programmatically either through an Open Auction or via LinkedIn Private Auctions. Both give you the flexibility and control to reach your target audiences on LinkedIn. If you're already buying programmatically, Open Auction is the fastest way to buy LinkedIn Display Ads programmatically. For advertisers looking for additional targeting capabilities, the Private Auction is a great option.

When using your own first or third party data like website visitors and CRM contacts, our Private Auction offers the ability to explicitly target the LinkedIn.com homepage as a placement. As another benefit, our Private Auction purchasing option allows advertisers to target select LinkedIn audience segments (e.g., target "IT decision makers") if you don't want to use your own first or third party data.

"From a marketing standpoint, the targeting is unprecedented. For marketing campaigns, LinkedIn can identify who to send it to and when to send it, but with precision we have never seen before. The success stories are still building, but we will see more B2B marketers drive success via LinkedIn over the next couple years."

—Craig Rosenberg, *The Funnelholic* www.funnelholic.com

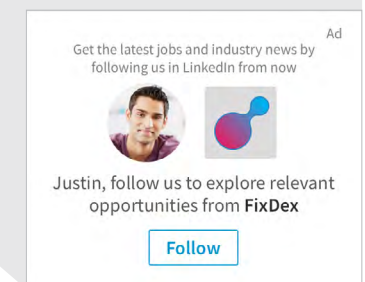
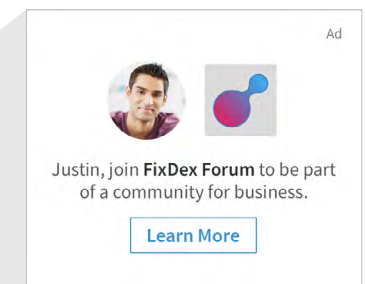
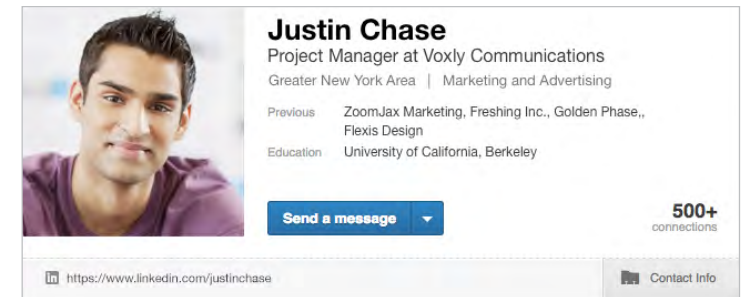
CHAPTER 7

Dynamic Ads for Personalized Targeting

As a sophisticated marketer, you know that message relevancy is critical to successfully connecting with target audiences and driving desired actions. And LinkedIn Dynamic Ads makes it possible to accurately target decision makers and deal influencers with highly relevant, dynamically generated, customizable creative on LinkedIn.com. Using Dynamic Ads, you can:

- Target the audiences that matter. Select the audiences you want to reach based on a wide range of professional targeting options, including company, work experience, groups, and interests.
- Customize your creative; personalize your message. Craft your ad copy, choose your call to action, and leverage dynamically generated images from LinkedIn member profiles.
- Grow your company follower count. Encourage LinkedIn members to follow your company and build better relationships with your target audience with one-click “Follow Company” calls to action.

60% of marketers say personalizing the customer experience is their top marketing objective.



CHAPTER 7

Text Ads: Generate Quality Leads with an Easy, Self-serve Solution

LinkedIn Text ads is an intuitive, self-service advertising solution that enables you to create easily (in minutes), then manage and optimize customized campaigns targeting a premium professional audience and drive high-quality leads to your business on a budget that works for you.

With Text Ads, you have at your fingertips the ability to:

- Easily create and launch well-targeted campaigns with customized creative in just minutes.
- Fine-tune your target audience based on location, demographics, skills, interests and work history to achieve the right mix of volume and precision.
- Gain meaningful insights into your campaign and creative performance with powerful audience segmentation analytics, and social engagement measurement tools
- Intelligently optimize your budgets, bids and creative to achieve your branding and customer acquisition objectives.

The screenshot displays the LinkedIn Text Ads creation interface. At the top, it says "Create 2015 Lower Funnel CXO campaign" and "Let's start building your ad". Below this, there are options for "Where should members go when they click your ad?" (My Page on LinkedIn or My Website) and a section for "Add a catchy headline, image and copy". A preview window shows the ad layout with a teal box highlighting the headline and image. The bottom part of the screenshot shows a LinkedIn profile for Justin Chase with a teal box highlighting an ad in the "Ads You May Be Interested In" section.

CHAPTER 7

LinkedIn Conversion Tracking: Easily Measure and Optimize the Business Impact of Your LinkedIn Sponsored Content, InMail, and Text Ads

LinkedIn [Conversion Tracking](#) — a set of capabilities built directly into LinkedIn Campaign Manager — enables you to easily measure leads, sign-ups, content downloads, purchases, and other desired actions on your LinkedIn Sponsored Content, InMail, and Text Ads campaigns. With conversion tracking, you can understand more about the specific ads and even the unique LinkedIn audiences that are driving your conversions. LinkedIn Conversion Tracking allows you to identify the seniority, industry, job function, location and company size of the people who are becoming leads.

With LinkedIn Conversion Tracking, you can:

- Track the metrics that matter most: Track website conversions from your LinkedIn programs directly in Campaign Manager. At a glance, you can understand your LinkedIn advertising ROI, conversion count, cost-per-conversion, conversion rate, and return on ad spend. You can even track which audience segments are driving the most conversions.
- Record every conversion, every time: Track conversions on your website from desktop and mobile, whether members converted after clicking on — or even after just viewing — one of your ads.

- Optimize your campaigns to drive even better performance: Monitor the specific campaigns, ads, and the nature of the audiences that are driving conversions. Then use this information to improve your Sponsored Content and Text Ads targeting and creative, and maximize the downstream impact of lead and opportunity pipeline goals.

With conversion tracking, you can:

1. Track leads from your LinkedIn ad campaigns.
2. Understand the ROI of your spend.
3. Optimize for the results that matter most.



CHAPTER 7

Ask the Expert:

Chris D'alessandro



**Chief Product Officer at
LegalShield Official**

LI: What factors are most important to you when considering advertising channels for your clients?

CD: It all depends on the goals of the campaign or what we are trying to accomplish. My focus is on a global campaign that transcends the US and Europe, so a lot of what we are doing is branding. We look at platforms as "how can we best utilize our money to get in front of as many people as we can to convince them we're a brand for them?" Question number one is always, "Can we build the brand on this platform?"

LI: What types of clients should be leveraging LinkedIn more than they currently are?

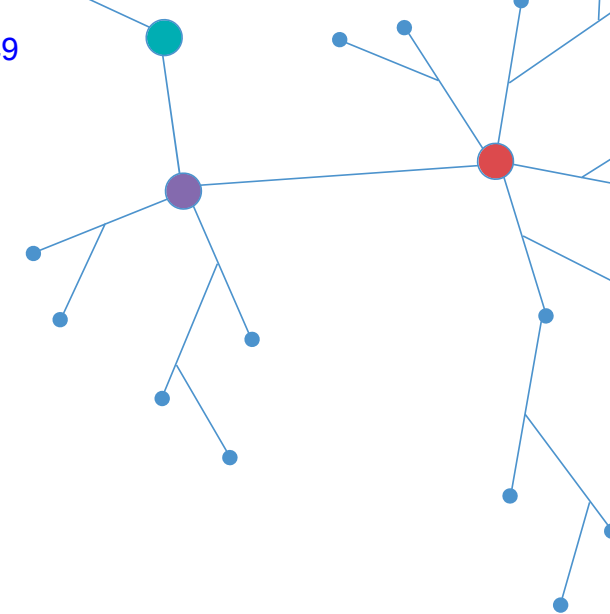
CD: Any organization that needs to do a better job of getting the brand in front of affluent people or just the right professional people. LinkedIn is a great platform for targeting this type of audience. The other type of client that needs to be on LinkedIn is any organization that needs to recruit top talent.

LI: How do you compare the audience targeting capability of LinkedIn with other social networks?

CD: The biggest thing that's come to our attention is that we can trust the results from LinkedIn. People are less apt to elaborate on LinkedIn than they are on other social networks. Sometimes you don't know if you're actually getting the person you're targeting, and my personal version of why I prefer LinkedIn over other social networks is because I know who I'm getting. I trust LinkedIn data not because other social networks are lying about their data, but rather because consumers are more apt to elaborate on other social networks.

LI: How are marketers getting it wrong with LinkedIn?

CD: They are seeing it as an advertising platform, and they are not leveraging it as a content platform. Advertisers are trying to drive lower funnel activities instead of participating in the conversation. I see LinkedIn as a way to continue the dialogue in a way that naturally promotes the value proposition of the brand, and I think many brands are still using it as an ad platform because most media-buying agencies follow the path of least resistance and buy what is easy. Getting the creative and content development teams involved makes it harder for them to buy. They can simply put an ad on the page instead of engaging the creative agency and building a plan that will be better in the long run.



CHAPTER 8

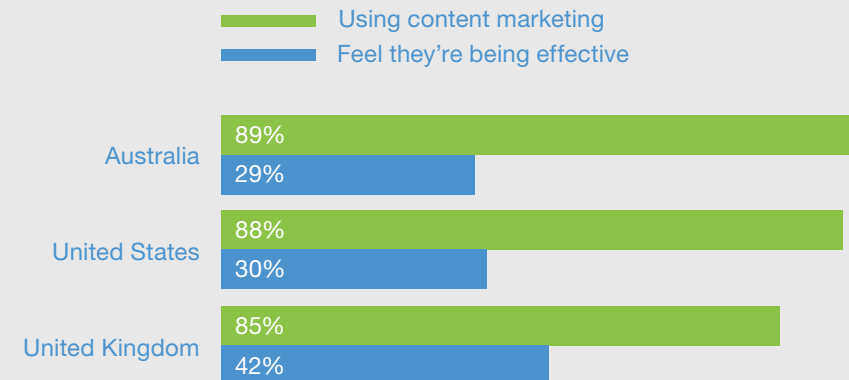
Measure the Impact and Optimize

Depending on your goals and the KPIs you use to measure performance, LinkedIn gives you clear visibility into your programs' impact throughout the purchase process.

- From the reach and share of voice as you look to create awareness, shape key LinkedIn audiences' perception (targeted impressions, percentage share of voice).
- Are the right people engaging with your content (social actions, click intelligence by audience, content marketing score, click-through rate, cost per click, cost per thousand)?
- Are you prompting them to take action (cost per lead, actions by audience)?

CLOSING THE CONTENT MARKETING GAP

DESPITE USING CONTENT MARKETING TO ACHIEVE THEIR GOALS, GLOBAL MARKETERS DON'T FEEL THEY'RE BEING AS EFFECTIVE AS THEY COULD BE.



Sources: Content Marketing in the UK: 2015 Benchmarks, Budgets, and Trends: Content Marketing Institute/DMA UK, Content Marketing in Australia: 2013 Trends — Content Marketing Institute/The Association for data-driven marketing & advertising (ADMA), 2016 B2B Content Marketing Trends — North America: Content Marketing Institute/MarketingProfs

CHAPTER 8

QUANTIFY YOUR CONTENT MARKETING EFFORTS ON LINKEDIN

As a sophisticated marketer, you know you need to prove your content marketing initiatives' impact. Ideally you want to:

- Understand the content and topics that resonate with your audience.
- Measure the effectiveness of your content-based campaigns.
- Benchmark your program success.
- See how you stack up against your competition.
- Rank your brand with a comprehensive score.

Like the most effective content marketers, you probably reach your audience in multiple ways across LinkedIn, via employee posts, Sponsored Content, and influencer posts. LinkedIn's Content Marketing Score ties all of this outreach together so you get an integrated view of how your efforts are paying off.

BENCHMARK YOUR CONTENT PERFORMANCE

Think of the Content Marketing Score as a barometer that helps your company, product, and brand understand the impact of its content marketing efforts on LinkedIn. By attributing a Content Marketing Score to your content, it quantifies the influence of your company, product, and brand on LinkedIn.

The Content Marketing Score provides this insight by:

- Highlighting the audience(s) consuming your content on LinkedIn
- Quantifying your company's content presence and engagement on LinkedIn

In other words, it tells you if members within your target audience are engaging with your content. And it can show you how you stack up against your competitors. You can even see a breakdown of how you're performing across the different areas of LinkedIn — whether by Groups, updates, or posts.

TURN INSIGHTS INTO CONTENT GOLD

All that information is valuable, but we know insights are useless unless you can act upon them. The Content Marketing Score makes that possible by providing specific recommendations on defining and adjusting your content strategy to achieve the best results possible. These may include suggestions to experiment with new ways to increase your follower base by utilizing Sponsored Content, encouraging employees to publish more posts, or focusing on your content relevance.

In a nutshell, the Content Marketing Score from LinkedIn:

- Analyzes who engages with your content
- Compares you to your peers
- Suggests how to improve your score

To receive your custom Content Marketing Score, please contact your LinkedIn account executive or account manager.

A Dynamic Duo

Unlike Trending Content, which gives you insight into the hottest topics across LinkedIn, the Content Marketing Score is specific to your company, product, and brand.



CHAPTER 8

BE TRENDY (WITH YOUR CONTENT)

Your target audience is on LinkedIn. Now it's just a matter of delivering the content that attracts and engages them. But how do you know just which topics will catch — and keep — their attention? And how do you know which members will be most interested in your content? Whether you're new to content marketing or looking to drive even more engagement with your existing content, Trending Content from LinkedIn can help you focus on the topics that matter.

On a daily basis, LinkedIn members actively engage with content from four primary sources of inspiration, insights, and information on our network:

- News from publishers
- Peers on LinkedIn Groups
- Thought leaders
- Brands

ALIGN YOUR CONTENT CALENDAR WITH YOUR AUDIENCE

With LinkedIn, you can see trending topics across all those sources: LinkedIn Groups, news posts, thought leadership posts and discussions, and Company Pages.

You'll see which topics matter and which members are sharing the most content on any given subject. You'll even be able to pinpoint which topics are going viral.

How do we deliver this invaluable data? We evaluate influencer articles, network updates, and Sponsored Content to understand which content members are sharing. Using a complex algorithm built by our data science team, we put each piece of content into one or more of over 17,000 topic categories. We then layer on member profile attributes to understand who is sharing the content.

With all that insight, you can fine-tune your strategy to align with the latest trends. That means you can increase the likelihood of your own content going viral and reach and engage more members on LinkedIn. To receive your custom Trending Content analysis, please contact your LinkedIn account executive or account manager.

These tools are currently available for LinkedIn Marketing Solutions customers with an Account Executive. You can contact your Account Executive for your score.

THE TOPICS THAT MATTER

WHAT'S TRENDING



Source: LinkedIn Internal Data

CHAPTER 8

Ask the Expert:

Lisa Weinstein



**CEO at The Engine Group
(Formerly President of Global Digital
Data and Analytics at Starcom
MediaVest Group)**

LI: What factors are most important to you when considering advertising channels for your clients?

LW: One of the things we say is that it's about behavior, not channels. From our perspective, when you start with consumer behavior, you usually start with data. We really believe that data helps to create experiences, and we use the phrases "created by data" and "creating its own data." You can use data to understand consumer behaviors

on a platform like LinkedIn. Then, as the consumer is engaged, he or she creates new data to help you optimize that experience. It starts with behavior, which is informed by data, which we then use to inform content.

LI: How are your clients' marketing objectives different on LinkedIn compared to other social networks? How does that impact your clients' content strategy?

LW: I would argue that the objectives of a platform like LinkedIn should not be different from other social networks and that all networks should add up to the clients' overall marketing objectives. As you drill down into the use case for LinkedIn, it could absolutely be leveraged for some more tactical and specific initiatives. But if you're talking about marketing objectives broadly, I'd like to think that everything we do and all these things we create ladders up to bigger objectives like sales, top of funnel, etc. Too often in social media, marketers get hung up on chasing the social networks' specific metrics. At the end of the day, what has to matter is that a marketer's investments are moving the



needle against the core macro objective. LinkedIn has proven effective for clients who leverage it across the spectrum of objectives ranging from brand lift and consideration to ROI and direct response. LinkedIn works against key measures, whether they are at the top or bottom of the funnel.

LI: How would you advise a marketer looking to create more "shareable" content? Are there specific strategies or tools you recommend?

LW: We believe sharing is an indicator of valuable consumer behavior. We've spent a lot of time on tools provided by companies like ShareThis, which provide powerful indicators of the types of content that are most sharable. We've built a planning tool that allows our planners to buy ads against content that is more likely to be shared. We've actually spent a lot of time in the space looking at trends of topics and keywords that are another indicator of things being shared.

We partner with companies like Visible Measures on the video side. It can be different with video, and they have years'

worth of data on the types of video content that will most likely drive certain earned responses. We also share that part to plan how our video content can drive greater shares, because we think it's a strategic question. It's vital to our strategy to think about the intersection of paid, owned, and earned content.

CHAPTER 9

Unlock the Power of LinkedIn's Partner Programs

LinkedIn's Partner Programs are designed to work with companies that share our goal of serving our members' needs. From entertaining promotions to targeted multi-channel messages, LinkedIn's platform can significantly increase your consumer engagement beyond LinkedIn.com. Strengthen your customer relationships, campaign performance, and company presence using the powerful technology and expertise of our partners.

ADS PARTNERS

Manage and optimize your advertising campaigns leveraging industry-leading technology and expert strategists.

CONTENT PARTNERS

Access high-quality professional content to power your content marketing.

COMPANY PAGE PARTNERS

Easily manage your LinkedIn Company Pages and other social properties using one unified dashboard.

CUSTOM APPS PARTNERS

Boost brand engagement and create unique experiences through custom-built marketing solutions.

COMPLIANCE PARTNERS

Leverage trusted technology to keep your LinkedIn marketing compliant with regulations in financial services and other industries.

ANALYTICS PARTNERS

Get marketing insights that help you build better LinkedIn campaigns and plan your media strategies.

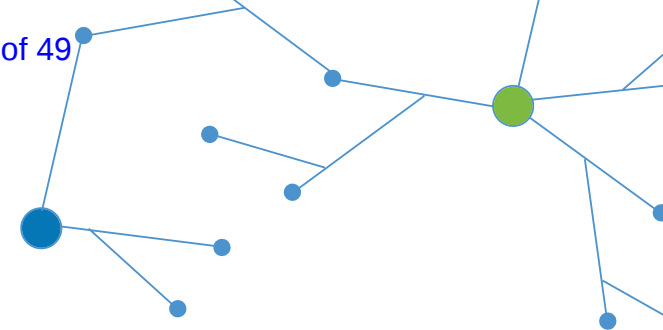
"Partnering with LinkedIn has enabled us to deliver robust audience demographics, content analytics, and publishing capabilities to today's biggest brands across every industry. Brands are using this context and capability to deliver great experiences that make professionals more productive and successful, and as a result, are building valuable and lasting relationships."

— Jim Rudden, CMO Spredfast Inc.

CHAPTER 9

Ask the Expert:

Kristina Jaramillo



**LinkedIn Marketing Expert,
GetLinkedInHelp.com**

LI: How are your marketing objectives different on LinkedIn compared to other social networks?

KJ: I do not do anything on Facebook, as my complete focus is on CEOs, C-level marketing and sales executives, and small business owners in B2B organizations. Twitter, I use as a tool to broadcast my different messages.

I use LinkedIn to directly connect with and build relationships with key decision makers (my prospects), key professionals

that influence business marketing decisions, and potential referral sources/white label partners.

LI: What type of content best connects with audiences on LinkedIn? Is there a specific type of content you prefer to consume on LinkedIn?

KJ: The best type of content that I found is case studies and real-life examples — this demonstrates your relevance. Most business leaders and B2B marketers' LinkedIn profiles do not have case studies. They talk about their skills and expertise but there is no content for their targeted prospects to see why they should connect. Within the different LinkedIn Groups, you should also create discussions on real-life case studies. This gives B2B organizations a chance to showcase their expertise and at the same time educate prospects on the challenges companies are having and the steps they need to take to overcome the challenge.

Here are some other forms of content that have worked well for me and for my Get LinkedIn Help clients:

Radio show interviews: I host a B2B marketing radio show at www.blogtalkradio.com/b2bmarketingradioshow where guest experts, including LinkedIn's Senior Content Marketing Manager Jason Miller, share their insights.

SlideShare presentations and videos that support your case study and result-based LinkedIn profile: Some of our clients' most-read discussions were based on their SlideShare presentation content.

Blog posts and articles that change the way people think and act: I personally love content that is meant to start a debate. The goal is to change how people present themselves on LinkedIn and how they market on LinkedIn.

LI: How do you make sure personal time spent on LinkedIn is productive? How does this differ from other social networks?

KJ: You create a LinkedIn strategy that includes identifying your goals, (lead generation, brand awareness, thought leadership, strengthening strategic alliances, community building, getting more VAR, etc.) — defining your target audience, locating the Groups your targeted audiences belong to and identifying the type of content that your audience will relate to. Within your strategy, you have to also map out the actions needed to take on LinkedIn (webinars, webcasts, whitepapers and email marketing).

LI: How are marketers getting it wrong with LinkedIn?

KJ: Marketers are getting it wrong with LinkedIn in a number of ways. They're basically completing brand maintenance activities instead of using it as a tool for lead generation. They may do some updates and some commenting on discussions but there is no strategy behind their efforts. They are just connecting with anyone and everyone.

25 Social Media Experts You Need to Know

Stay in the know with tips and advice from the leading social media experts. Here's a list of some of our favorites, representing the best of the best in social media marketing.

1. Jay Baer

Speaker, Author, Consultant
Blogs: jaybaer.com,
convinceandconvert.com
Twitter: @jaybaer
LinkedIn: [in/jasonbaer](https://www.linkedin.com/in/jasonbaer)

2. Michael Brenner

Senior Director, Global Marketing at SAP, President and Co-Founder of Business2Community
Blog: b2bmarketinginsider.com
Twitter: @BrennerMichael
LinkedIn: [in/michaelbrenner](https://www.linkedin.com/in/michaelbrenner)

3. Michael Brito

Group Director Media and Engagement at WCG, a W2O Company
Blog: britopian.com
Twitter: @Britopian
LinkedIn: [in/michaelbrito](https://www.linkedin.com/in/michaelbrito)

4. Jeff Bullas

Consultant, Speaker, Blogger
Blog: jeffbullas.com
Twitter: @jeffbullas
LinkedIn: [in/jeffbullas](https://www.linkedin.com/in/jeffbullas)

5. Brian Carter

VP of Marketing at Infinigraph, Author, Speaker
Blog: briancarteryeah.com/blog/
Twitter: @briancarter
LinkedIn: [in/briancarterms](https://www.linkedin.com/in/briancarterms)

6. Brian Clark

Founder and CEO of Copyblogger
Blog: copyblogger.com/blog/
Twitter: @copyblogger
LinkedIn: [pub/brian-clark/8/606/b5a](https://www.linkedin.com/pub/brian-clark/8/606/b5a)

7. Heidi Cohen

Columnist
Blog: heidicohen.com/tag/blog/
Twitter: @heidicohen
LinkedIn: [in/heidicohen](https://www.linkedin.com/in/heidicohen)

8. Steven Farnsworth

Chief Digital Strategist at Jolt Digital Marketing, Author, Speaker
Blog: stevefarnsworth.wordpress.com
Twitter: @steveology
LinkedIn: [in/stevefarnsworth](https://www.linkedin.com/in/stevefarnsworth)

9. Barry Feldman

Owner at Feldman Creative, Speaker
Blog: feldmancreative.com/blog
Twitter: @FeldmanCreative
LinkedIn: [in/feldmancreative](https://www.linkedin.com/in/feldmancreative)

10. Ann Handley

Head of Content at Marketing Profs, Author
Blog: marketingprofs.com
Twitter: @annhandley
LinkedIn: [/in/annhandley](https://www.linkedin.com/in/annhandley)

11. Matt Heinz

President at Heinz Marketing Inc
Blog: heinzmarketing.com
Twitter: @HeinzMarketing
LinkedIn: [in/mattheinz](https://www.linkedin.com/in/mattheinz)

12. Doug Karr

Chief Marketing Officer at CircuPress, Author
Blog: marketingtechblog.com/author/douglaskarr/
Twitter: @douglaskarr
LinkedIn: [in/douglaskarr](https://www.linkedin.com/in/douglaskarr)

13. Jason Keath

CEO of Social Fresh
Blog: socialfresh.com
Twitter: @jasonkeath
LinkedIn: [in/jasonkeath](https://www.linkedin.com/in/jasonkeath)

14. Nichole Kelly

CEO at Social Media Explorer, SME Digital
Author, Speaker
Blog: socialmediaexplorer.com
Twitter: @Nichole_Kelly
LinkedIn: [in/nicholekelly](https://www.linkedin.com/in/nicholekelly)



25 Social Media Experts You Need to Know

15. Dave Kerpen

CEO Likeable Local
Author, Speaker
Blog: davekerpen.com/blog
Twitter: @DaveKerpen
LinkedIn: [in/davekerpen](https://www.linkedin.com/in/davekerpen)

16. Stephanie Sammons

Founder of Wired Advisor™
Speaker
Blog: blog.wiredadvisor.com
Twitter: @StephSammons
LinkedIn: [in/stephaniesammons](https://www.linkedin.com/in/stephaniesammons)

17. David Meerman Scott

Marketing Strategist,
Speaker, Author
Blog: webinknow.com
Twitter: @dmscott
LinkedIn: [in/davidmeermanscott](https://www.linkedin.com/in/davidmeermanscott)

18. Jason Miller

Group Manager, Content Marketing
Blog: rocknrollcocktail.com/
Twitter: @JasonMillerCA
LinkedIn: [in/jsnmiller](https://www.linkedin.com/in/jsnmiller)

19. Lee Odden

CEO at TopRank Online Marketing
Author, Speaker
Blog: toprankblog.com
Twitter: @leeodden
LinkedIn: [in/leeodden](https://www.linkedin.com/in/leeodden)

20. Joe Pulizzi

Founder at Content Marketing Institute
Author, Speaker
LinkedIn: [in/joepulizzi](https://www.linkedin.com/in/joepulizzi)
Twitter: @JoePulizzi
Blog: contentmarketinginstitute.com

21. Viveka Von Rosen

LinkedIn Expert, Author
Blog: linkedintobusiness.com/
Twitter: @LinkedInExpert
LinkedIn: [in/linkedinexpert](https://www.linkedin.com/in/linkedinexpert)

22. Neal Schaffer

Author, Speaker
LinkedIn: [in/nealschaffer](https://www.linkedin.com/in/nealschaffer)
Blog: maximizeyoursocial.com/
Twitter: @NealSchaffer
LinkedIn: [in/nealschaffer](https://www.linkedin.com/in/nealschaffer)

23. Koka Sexton

Global Industry Principal,
Social Selling, Hootsuite
Blog: kokasexton.com/word/
Twitter: @kokasexton
LinkedIn: [in/kokasexton](https://www.linkedin.com/in/kokasexton)

24. Mike Stelzner

Founder of Social Media Examiner,
Author
Blog: socialmediaexaminer.com
Twitter: @Mike_Stelzner
LinkedIn: [in/stelzner](https://www.linkedin.com/in/stelzner)

25. Todd Wheatland

VP of Marketing at Kelly Services
Author, Speaker
Blog: slide-guidebook.com/
Twitter: @ToddWheatland
LinkedIn: [in/wheatland](https://www.linkedin.com/in/wheatland)





ABOUT US

LinkedIn members number more than 467 million professionals. That's over half of the 600 million professionals on the planet. This represents the largest group anywhere of influential, affluent and educated people.

PROFESSIONAL PUBLISHING PLATFORM

Our evolution into a professional publishing platform drives increased engagement on LinkedIn. Compared with other professional publishers, content on LinkedIn works differently. The rich data on our platform means we can deliver the most relevant content to our members.

RELATIONSHIPS MATTER

With LinkedIn Marketing Solutions, brands build relationships with the world's professionals by using accurate targeting to deliver relevant content and communications.

As today's connected professionals seek out ideas and insights from the people and brands they trust, marketers use LinkedIn to target advertising and publish relevant content in a professional context. Brands extend reach through the social sharing that occurs naturally on LinkedIn.

For more information, visit marketing.linkedin.com.

Exhibit C

You are receiving a transactional email message from LinkedIn because your account(s) may have been impacted by a measurement issue.



?Ashkan Rajae



Dear ?Ashkan,

Thank you for being a valued LinkedIn customer.

We are committed to transparency and the integrity of our ads products, and want to let you know about two measurement issues that our engineering team discovered in August and have subsequently fixed.

As a result of these issues, we may have over-reported some of your Sponsored Content metrics for impression and video views.

Your total impact was less than \$100 across all of your accounts, but we would like to offer you a \$50 or \$100 credit per account corresponding to the level of impact.*

- If your account is billed by insertion order, please reach out to your LinkedIn account representative by February 15, 2021 for assistance getting your credit.
- If your account is billed by online invoice, your credit will be automatically reflected in either your December or January invoice.
- If your account is billed by credit card, please use the coupon codes above by February 15, 2021. Please make sure your billing information is up-to-date by logging into [Campaign Manager](#) and visiting your Billing Center.

Please [contact us](#) if you encounter any problems.

You can learn more by reading our [blog post](#). We apologize for the inconvenience, and thank you for being a LinkedIn customer.

Account ID: [REDACTED]
Account Name: TopDevz Ad Account
Coupon Code: [REDACTED]

**Credits will be given in your local currency and valid for one year from the date of receipt.*

Kind Regards,
LinkedIn Customer Support

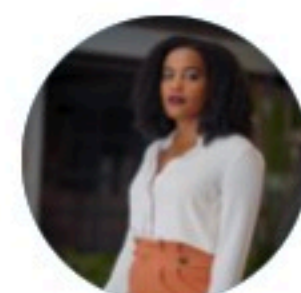
Exhibit D

4:07

Search

LinkedIn Customer S... 4:05 PM
to me

Shaniqua (Shawn) Davis



Dear Shaniqua (Shawn),

We are committed to transparency and the integrity of our ads products, and want to let you know about two measurement issues that our engineering team discovered in August and have subsequently fixed.

As a result of these issues, we may have over-reported some of your Sponsored Content metrics for impression and video views.

Your total impact was less than \$10 across all of your account(s), but we would like to offer you a credit of \$50.*

- If your account is billed by insertion order, please reach out to your LinkedIn account representative by March 31, 2021 for assistance getting your credit.
- If your account is billed by online invoice, your credit will be automatically reflected in either your January, February, or March invoice.
- If your account is billed by credit card, please redeem the coupon codes below by March 31, 2021. Please make sure your billing information is up-to-date by logging into [Campaign Manager](#) and visiting your Billing Center.

4:08 ↗



◀ Search



- If your account is billed by insertion order, please reach out to your LinkedIn account representative by March 31, 2021 for assistance getting your credit.
- If your account is billed by online invoice, your credit will be automatically reflected in either your January, February, or March invoice.
- If your account is billed by credit card, please redeem the coupon codes below by March 31, 2021. Please make sure your billing information is up-to-date by logging into [Campaign Manager](#) and visiting your Billing Center.

Please [contact us](#) if you encounter any problems.

You can learn more by reading our [blog post](#). We apologize for the inconvenience, and thank you for being a LinkedIn customer.

Account ID: [REDACTED]

Account Name: Shaniqua (Shawn)'s Ad Account

Coupon Code: [REDACTED]
[REDACTED]

**Credits will be given in your local currency and valid for one year from the date of receipt.*

Kind Regards,

LinkedIn Customer Support