



Campaign for a Commercial-Free Childhood

CENTER FOR
DIGITAL
DEMOCRACY

June 26, 2017

Tom Pahl
Acting Director
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

Mary K. Engle
Associate Director
Division of Advertising Practices
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Mr. Pahl and Ms. Engle,

Despite the Federal Trade Commission's (FTC) attempt to educate paid influencers and brands about the importance of using disclosures, influencers on Instagram continue to mislead consumers by posting paid endorsements without a proper disclosure. Public Citizen, Campaign for a Commercial-Free Childhood, and Center for Digital Democracy request that the Federal Trade Commission (FTC) further investigate the influencer marketing landscape on Instagram, and act now to affirmatively enforce its endorsement policy.

Last September, Public Citizen identified over 100 influencers who failed to comply with the FTC's disclosure policy. Although the FTC sent letters to individual influencers reminding them to comply with endorsement policies, our most recent investigation proves that this measure is insufficient. Of the 46 influencers to whom the FTC sent reminder letters, only one has consistently used proper disclosures on what are likely paid posts since receiving the letter. Influencers and advertisers continue to violate FTC policy, misleading and deceiving the millions of consumers who use Instagram every day.

FTC's Policy and Reminder Letters

Under the FTC Act, a practice is deceptive if it is likely to affect a consumer's choice regarding the product being advertised. Standards like this are essential for preserving consumer autonomy.¹ If consumers are not aware that they are being advertised to, they cannot fully exercise their freedom of choice. When an influencer posts a paid endorsement for a product without a disclosure, it can be impossible to distinguish an advertisement from a recommendation made without monetary inducement. Consumers trust and respect the influencers who they follow online. This trust is an invaluable marketing tool that companies are exploiting.

The FTC defines an endorsement as “any advertising message... that consumers are likely to believe reflects the opinions, beliefs, findings, or experiences of a party other than the sponsoring advertiser...”² The endorser must disclose any material connection to the seller. This is essential information for consumers because it defines the difference between an advertisement and an unbiased recommendation. Disclosures of material connection must be “clear and conspicuous.” This standard is clarified by FTC guidelines regarding the placement, language, and syntax of disclosures for social media. The FTC suggests that influencers should place the disclosure close to the “triggering claim” and above the “more” button in the caption so users do not have to click and scroll to see it. It is also recommended that influencers do not “bury” the disclosure among other hashtags. Additionally, language such as “#Advertisement” and “#Sponsored” is better than “#sp” to stand for “sponsored”.³ The ultimate responsibility to uphold these standards falls on the advertisers.

On April 19, 2017, the FTC issued 90 letters to influencers and marketers who failed to follow FTC policy. The letters reminded influencers to “clearly and conspicuously” cite the proper disclosures to identify material connections. A material connection is defined as “a connection that might affect the weight or credibility that consumers give the endorsement.” This includes family relationships, monetary payment, or the provision of free goods. The FTC reminded influencers that using ambiguous language and deceptive placement make it difficult for consumers to recognize that the post is an advertisement.⁴

Evidence of Serial Non-Compliance

Public Citizen tracked the Instagram activity of the 46 influencers who were sent letters from the FTC to determine if the letters were effective at changing behavior. We looked at whether or not an influencer posted a sponsored post, and if they used a disclosure. We also noted if the disclosure was in line with FTC guidelines. During the observation period, May 1 to June 12, only one of the influencers consistently used proper disclosures for paid posts. While some influencers did occasionally post sponsored content using the proper disclosure, the same influencers continued to post both disclosed and undisclosed content. Based on this investigation,

it is fair to conclude that the FTC's reminder letters have not been effective, and influencers and advertisers are disregarding both the FTC's letter and guidelines.

Out of 412 posts featuring sponsored content within the six week observation period, only 84 posts included a proper disclosure.⁵ In total, 327 (about 79%) of the 412 advertisements did not comply with FTC standards.

Many of the undisclosed advertisements featured a beauty product such as makeup, tanning lotion, vitamin injection treatments, or expensive "body contouring" cellulite removal treatments. This is problematic for young and impressionable consumers who look to influencers and celebrities as role models. Influencers help to set standards of beauty, fitness and health, and their young audiences take note. Actors, musicians, athletes, fitness and beauty gurus, and television personalities all have young followers who look up to them. Products such as weight-loss tea supplements (Teami Blends and Flat Tummy Tea), expensive "cleanses" (The Clean Program), and teeth whitening products (Pearly Whites Australia) all promote an unrealistic, and potentially harmful, standard of beauty and health.

It is important to note that our research does not reflect the full scope of this phenomenon. The sample of influencers in this study represents a small fraction of influencers who violate FTC policy on Instagram and other social media platforms.

According to a study by Mediakix, an influencer marketing agency, 93% of sponsored posts made by the top followed celebrities on Instagram are not disclosed. For 30 days, Mediakix observed the Instagram activity of the 50 most followed celebrities on Instagram. Their analysis determined that 30 accounts posted sponsored content, and of those sponsored posts, 93% were not compliant with FTC policy. These specific influencers have a significant reach of 2.5 billion followers combined, indicating that they are reaching consumers billions of times every day with undisclosed sponsored content.⁶

Additionally, advertisers are relying on influencer marketing strategies to an ever greater extent.⁷ With 700 million active users every month on Instagram, the FTC must actively respond to protect consumers.⁸

Requested Action

Given the pervasiveness and reach of nondisclosed influencer advertising on Instagram, we request that the FTC bring enforcement actions and seek penalties for posting nondisclosed sponsored content, especially for influencers and brands that are repeat offenders. The FTC must demonstrate that there will be consequences for failure to follow the FTC's guidelines. While the onus of responsibility falls on marketers, the FTC should also work directly with influencers to acknowledge their noncompliance and set a precedent in order to change influencer behavior in the long term.

Additionally, the FTC should work with Instagram to develop a system that makes it easy to denote paid posts consistent with FTC guidelines. Instagram has recently adopted an advertising post identification system, but it needs to be refashioned to do the job of protecting consumers from deceptive, hidden ads. Instagram could create an option that allows influencers to select “paid post” when posting a photo. This could then automatically put a red box around the photo with the word “advertisement” at the top of the photo. When the image appears on users’ newsfeeds, it will be clearly labelled as an advertisement. Even users who do not read the entirety of every caption will be alerted that what they are seeing is an advertisement. Working with Instagram could provide a long-term and uniform solution.

Public Citizen’s investigation proves that despite the FTC’s reminder letters, the practice of posting undisclosed advertisements on Instagram is pervasive and is not going away. Marketing companies recognize the profitability of undisclosed influencer advertising, while ignoring the consequences for consumers. This occurs on all forms of social media, but the problem is particularly stunning on Instagram. We urge the FTC to take action by bringing enforcement actions and seeking fines for repeat offenders, and we suggest that the FTC work with Instagram on a long-term solution.

We are happy to meet to discuss these matters further.

Sincerely,

Robert Weissman
President, Public Citizen

Kristen Strader
Campaign Coordinator, Commercial Alert

Josh Golin
Executive Director, Campaign for a Commercial-Free Childhood

Jeffrey Chester
Executive Director, Center for Digital Democracy

Sources

¹ Federal Trade Commission. Federal Trade Commission Act: Incorporating U.S. SAFE WEB Act Amendments of 2006. (2006). Washington, D.C.: Federal Trade Commission. Retrieved from https://www.ftc.gov/sites/default/files/documents/statutes/federal-trade-commission-act/ftc_act_incorporatingus_safe_web_act.pdf

² Federal Trade Commission. (2017). FTC Staff Reminds Influencers and Brands to Clearly Disclose Relationship. Retrieved from <https://www.ftc.gov/news-events/press-releases/2017/04/ftc-staff-reminds-influencers-brands-clearly-disclose>

³ Federal Trade Commission (2013). .com Disclosures: How to Make Effective Disclosures in Digital Advertising. Retrieved from <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>

⁴ Federal Trade Commission. (2017). FTC Staff Reminds Influencers and Brands to Clearly Disclose Relationship. Retrieved from <https://www.ftc.gov/news-events/press-releases/2017/04/ftc-staff-reminds-influencers-brands-clearly-disclose>

⁵ See Appendix A

⁶ Mediakix Team. (2017). 93% of Top Celebrity Social Media Endorsements Violate FTC Guidelines. Retrieved from <http://mediakix.com/2017/05/celebrity-social-media-endorsements-violate-ftc-instagram/#gs.b4vkg1k>

⁷ Cole, Nicolas. (2016). In 2017 Influencer Marketing Is About To Go Through The Roof. Retrieved from <https://www.inc.com/nicolas-cole/in-2017-influencer-marketing-is-about-to-go-through-the-roof.html>

⁸ Dunn, Jeff. (2017). Instagram is on pace to be Facebook's next billion-user app. Retrieved from <http://www.businessinsider.com/instagram-how-many-users-growth-chart-2017-4>

Appendix A

No = posted sponsored content, did not follow FTC guidelines (nondisclosed post)

Yes = posted sponsored content, did follow FTC guidelines (disclosed post)

Name	Week 1 (May 1-8)		Week 2 (May 8-15)		Week 3 (May 15-22)		Week 4 (May 22-29)		Week 5 (May 29-June 5)		Week 6 (June 5-12)	
	no	yes	no	yes	no	yes	no	yes	no	yes	no	yes
Mr. Nicky Jam	1	0	1	0	1	0	0	0	0	0	0	0
Ms. Jen Selter	0	0	0	0	0	0	1	0	1	0	2	0
Mr. Sean Combs	10	0	2	0	2	6	1	3	1	5	1	1
Ms. Shay Mitchell	0	2	2	0	1	0	5	0	1	0	1	1
Ms. Ciara Princess Wilson	1	0	0	0	0	0	0	0	0	0	0	0
Ms. Dorothy Wang	0	0	1	0	0	0	0	0	2	0	1	0
Mr. Luke Bryan	0	0	0	0	1	1	0	1	0	1	0	0
Ms. Kristin Cavallari	0	0	0	0	1	0	0	2	5	0	3	0
Ms. Lucy Hale	1	0	0	0	0	0	0	1	3	0	0	0
Ms. Naomi Campbell	0	0	0	0	0	0	2	0	1	0	0	0
Ms. Giuliana Rancic	0	0	0	1	0	0	0	0	2	0	1	0
Ms. Sofia Vergara	6	0	0	0	0	0	1	0	0	0	1	0
Ms. Heidi Klum	0	0	0	0	1	0	1	0	0	0	0	0
Ms. Rach Parcell	8	1	12	2	3	2	2	1	7	0	2	0
Ms. Jenni "Jwoww"	5	0	5	0	4	0	2	1	6	2	0	1
Ms. Jamie Lynn Spears	1	1	0	0	1	0	0	0	0	1	0	0
Ms. Maci Bookout McKinney	1	0	0	0	1	0	1	1	0	1	0	0
Ms. Tiona Fernan	8	0	3	0	10	0	6	0	3	0	4	1
Ms. Nicole Polizzi	1	0	0	0	0	0	0	0	0	0	1	0
Ms. Amber Rose	0	1	4	0	4	1	3	4	3	0	3	0
Ms. Vanessa Hudgens	0	1	0	0	0	1	1	1	0	0	0	0
Ms. Valentina Vignali	5	1	5	0	6	3	6	1	4	0	9	1
Ms. Lilly Ghalach	13	0	7	0	0	0	2	0	4	0	3	0
Ms. Caroline Manzo	0	0	0	0	0	0	0	1	0	0	0	0
Mr. Allen Iverson	0	0	0	0	0	0	0	0	0	0	0	0
Ms. Behati Prinsloo	1	0	1	0	0	0	0	0	0	0	0	0
Ms. Anna Petrosian	0	0	0	0	1	0	0	0	0	0	1	0
Ms. Victoria Beckham	1	0	0	0	0	0	0	0	0	0	0	0
Ms. Chelsea Houska	0	0	0	0	0	0	0	0	1	0	0	2
Ms. Troian Bellisario	1	0	1	0	0	1	0	0	0	0	0	0
Ms. Nina Agdal	1	1	0	0	0	0	0	1	0	0	0	1
Ms. Ashley Benson	1	0	2	1	1	3	5	1	4	1	3	0
Ms. Emily Ratajkowski	1	0	0	0	0	0	0	0	0	0	0	0
Ms. Denice Moberg	1	0	1	0	7	0	0	0	1	0	2	0
Mr. James Harrison	0	0	0	0	0	0	0	0	0	0	0	0
Mr. Scott Disick	0	0	0	0	2	1	0	0	0	0	1	1
Ms. Lindsay Lohan	0	0	0	0	3	0	1	0	1	0	0	0
Ms. Bella Thorne	1	1	1	1	0	0	0	0	0	0	0	0
Ms. Zendaya	0	0	1	0	1	0	0	0	0	0	0	0
Ms. Sophia Bush	0	0	2	0	0	0	1	0	0	0	0	0
Ms. Massy Arias	0	0	0	0	0	1	0	0	0	1	1	0
Ms. Farrah Abraham	4	0	0	0	0	1	1	3	0	2	2	3
Ms. Lisa Rinna	3	0	0	0	1	0	0	0	0	0	0	0
Mr. Alianme Damala Badara Ak	0	0	0	0	3	0	1	0	0	0	0	0
Ms. Jennifer Lopez	2	0	0	0	0	0	0	0	0	0	0	0
Ms. Vanessa Lachey	0	1	1	0	0	0	0	0	0	0	0	1
Total posts	78	10	52	5	55	21	43	22	50	14	49	13

Name	total # undisclosed posts	total # disclosed
Mr. Nicky Jam	3	0
Ms. Jen Selter	4	0
Mr. Sean Combs	17	15
Ms. Shay Mitchell	10	3
Ms. Ciara Princess Wilson	1	0
Ms. Dorothy Wang	4	0
Mr. Luke Bryan	4	3
Ms. Kristin Cavallari	9	2
Ms. Lucy Hale	4	1
Ms. Naomi Campbell	3	0
Ms. Giuliana Rancic	3	1
Ms. Sofia Vergara	8	0
Ms. Heidi Klum	2	0
Ms. Rach Parcell	34	6
Ms. Jenni "Jwoww"	22	4
Ms. Jamie Lynn Spears	2	2
Ms. Maci Bookout McKinney	3	2
Ms. Tiona Fernan	34	1
Ms. Nicole Polizzi	2	0
Ms. Amber Rose	17	6
Ms. Vanessa Hudgens	1	3
Ms. Valentina Vignali	35	6
Ms. Lilly Ghalachi	29	0
Ms. Caroline Manzo	0	1
Mr. Allen Iverson	0	0
Ms. Behati Prinsloo	2	0
Ms. Anna Petrosian	2	0
Ms. Victoria Beckham	1	0
Ms. Chelsea Houska	1	2
Ms. Troian Bellisaro	2	1
Ms. Nina Agdal	1	3
Ms. Ashley Benson	16	6
Ms. Emily Ratajkowski	1	0
Ms. Denice Moberg	12	0
Mr. James Harrison	0	0
Mr. Scott Disick	3	2
Ms. Lindsay Lohan	5	0
Ms. Bella Thorne	2	2
Ms. Zendaya	2	0
Ms. Sophia Bush	3	0
Ms. Massy Arias	1	2
Ms. Farrah Abraham	7	6
Ms. Lisa Rinna	4	0
Mr. Alianme Damala Badara Ak	4	0
Ms. Jennifer Lopez	2	0
Ms. Vanessa Lachey	1	2
	327	85
Total posts	412	

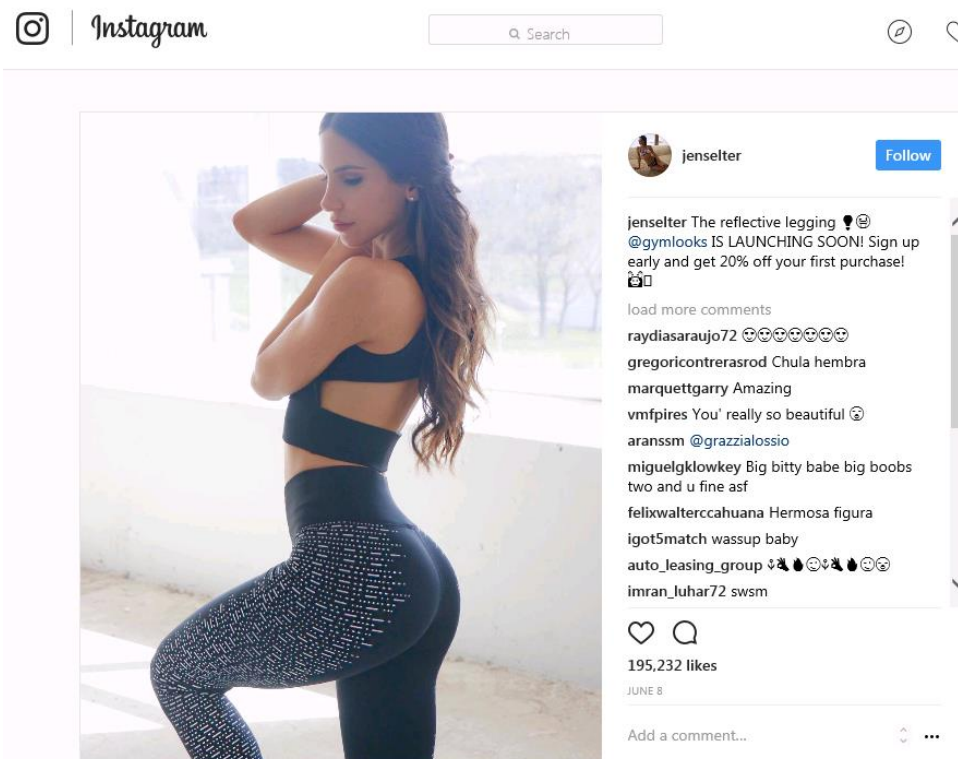
Appendix B

Samples of undisclosed posts made by influencers after receiving the FTC's letter:

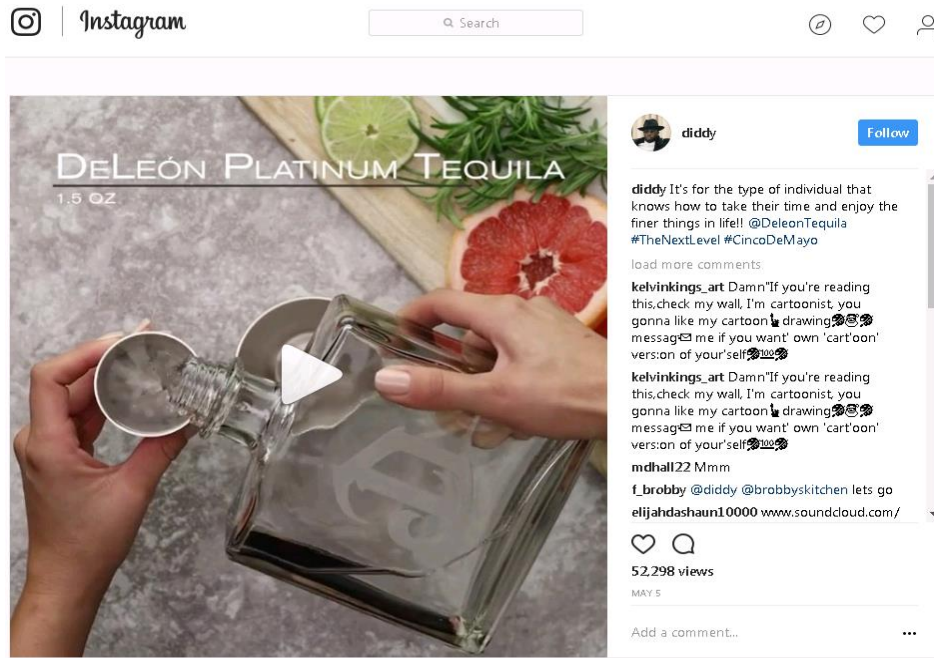
1. Endorser: Nicky Jam
Brand: Bomberg Colombia
Followers: 18.6m



2. Endorser: Jen Selter
Brand: Gym Looks
Followers: 11.4m



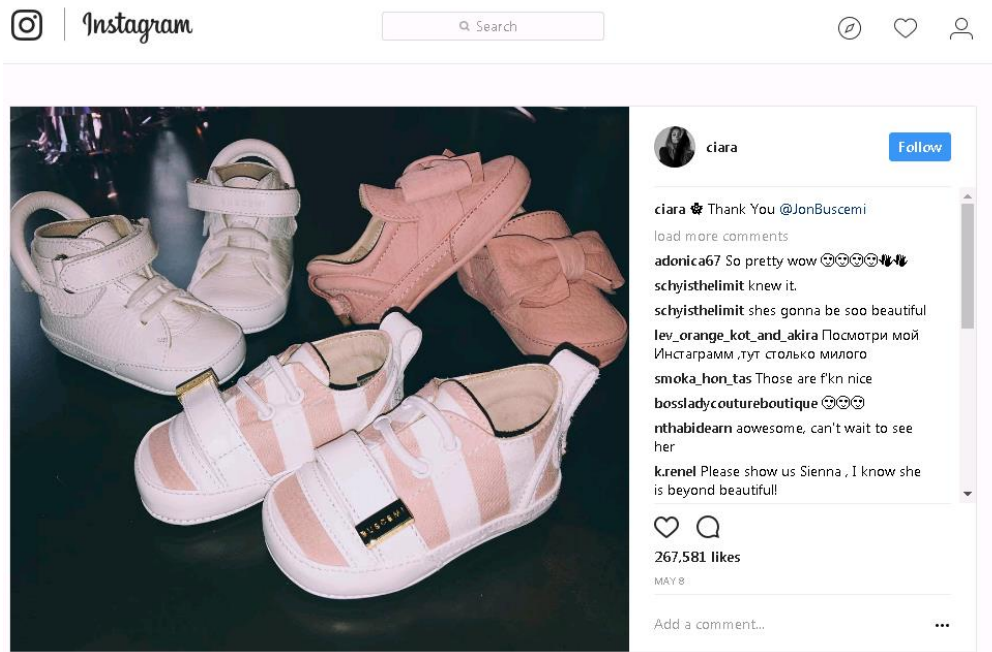
- 3. Endorser: Sean Combs
Brand: DeLeon Tequila
Followers: 8.2m



- 4. Endorser: Shay Mitchell
Brand: Epic Road
Followers: 17.2m



5. Endorser: Ciara
Brand: Jon Buscemi
Followers: 16.6m



The screenshot shows an Instagram post from user 'ciara'. The main image displays several pairs of shoes: white high-top sneakers, white low-top sneakers with pink stripes, and pink high-top sneakers. The post includes a caption, a list of comments, and engagement metrics. The interface includes the Instagram logo, a search bar, and navigation icons.

ciara Thank You @JonBuscemi

load more comments

adonica67 So pretty wow 🥰🥰🥰🥰🥰🥰

schyisthelimit knew it.

schyisthelimit shes gonna be soo beautiful

lev_orange_kot_and_akira Посмотри мой Инстаграмм ,тут столько милого

smoka_hon_tas Those are f'kn nice

bossladycoutureboutique 🥰🥰🥰

nthabidearn aawesome, can't wait to see her

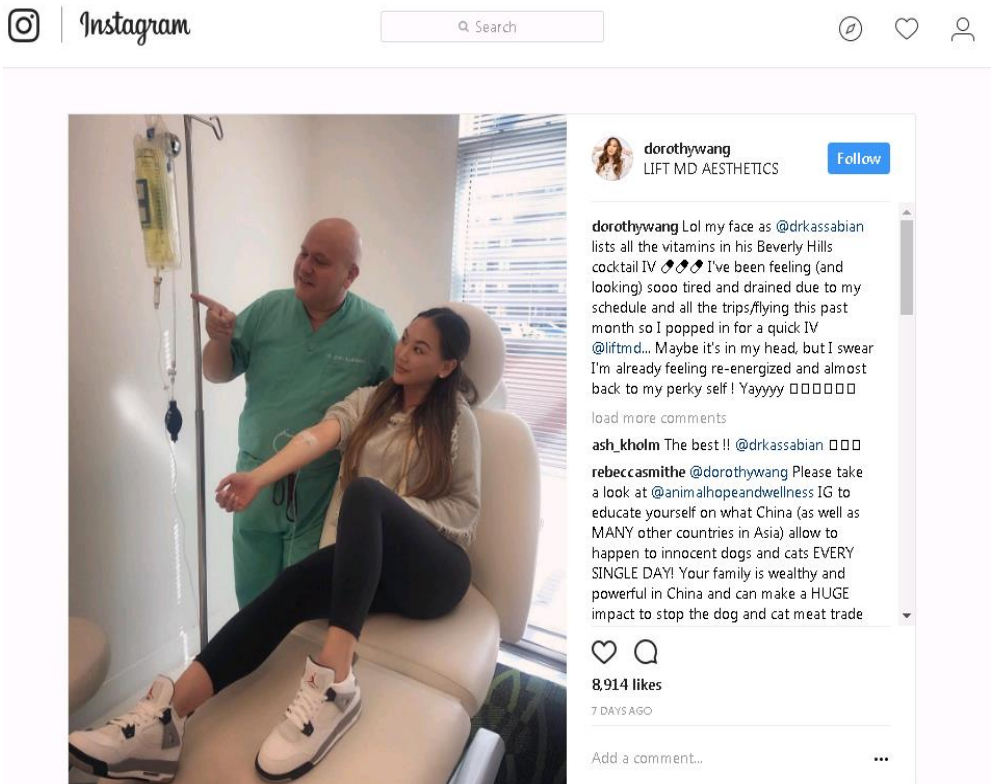
krenel Please show us Sienna , I know she is beyond beautiful!

267,581 likes

MAY 8

Add a comment...

6. Endorser: Dorothy Wang
Brand: Lift MD
Followers: 985k



The screenshot shows an Instagram post from user 'dorothywang'. The main image depicts Dorothy Wang sitting in a medical chair while a healthcare professional in green scrubs stands by her side, pointing towards a medical device. The post includes a caption, a list of comments, and engagement metrics. The interface includes the Instagram logo, a search bar, and navigation icons.

dorothywang LIFT MD AESTHETICS

Lol my face as @drkassabian lists all the vitamins in his Beverly Hills cocktail IV 🥰🥰🥰 I've been feeling (and looking) sooo tired and drained due to my schedule and all the trips/flying this past month so I popped in for a quick IV @liftmd... Maybe it's in my head, but I swear I'm already feeling re-energized and almost back to my perky self! Yayyyy 🍻🍻🍻🍻

load more comments

ash_kholm The best !! @drkassabian 🍻🍻

rebeccasmithe @dorothywang Please take a look at @animalthopeandwellness IG to educate yourself on what China (as well as MANY other countries in Asia) allow to happen to innocent dogs and cats EVERY SINGLE DAY! Your family is wealthy and powerful in China and can make a HUGE impact to stop the dog and cat meat trade

8,914 likes

7 DAYS AGO

Add a comment...


- 7. Endorser: Luke Bryan
Brand: Farm Tour
Followers: 3.7m

The image shows an Instagram post from Luke Bryan. The main image is a promotional graphic for Cabela's Alaska Fly-Away Contest. It features Luke Bryan in a black t-shirt and a grey baseball cap. The text on the graphic includes 'Cabela's' in yellow, 'H F E' in circular icons, 'HUNTIN' FISHIN' AND LOVIN' EVERY DAY', 'ALASKA FLY-AWAY CONTEST' in large blue letters, and 'ENTER TO WIN THE TRIP OF A LIFETIME'. The post interface shows the user's profile 'lukebryan' with a 'Follow' button, a caption mentioning the #HFETour, and several comments from users like @mathenajan and @oneill_stephanie. The post has 25,280 likes and is dated May 19.

- 8. Endorser: Lucy Hale
Brand: Veuve Clicquot
Followers: 18.5m

The image shows an Instagram post from Lucy Hale. The main image is a photograph of Lucy Hale standing on a green polo field with the New York City skyline in the background. She is wearing a long-sleeved, floral-patterned dress and sunglasses. The post interface shows the user's profile 'lucyhale' with a 'Follow' button, a caption mentioning 'Beautiful day in Jersey overlooking NYC for the @veuvecliquot Polo Classic', and several comments from users like @ayoosh_6738 and @aliceberselli. The post has 701,154 likes and is dated June 3.

9. Endorser: Naomi Campbell
Brand: Globe Trotter
Followers: 4.2m



Instagram | Search

iamnaomicampbell Follow

iamnaomicampbell #onthemove @globe_trotter1897 #wheretnext?? #omitravelstheworld JP❤️👍👍👍

load more comments

veryfashionplanet 🍷🍷🍷
capriquarian85 🍷🍷🍷
ebs710 @kerrian84
crstlva11 My favorite color ❤️
nd650290 Cool 🍷🍷🍷 Brasil
amigabali Wow
kikinietzsche @mrprincewilliam dream luggage
sucheezy @tungyy
bryanstyling I can't wait for you to come to Boston so I can show you around the city 😊😊😊 @iamnaomicampbell

27,635 likes
MAY 30

Add a comment...

10. Endorser: Giuliana Rancic
Brand: G by Giuliana
Followers: 2.7m



Instagram | Search | Get the app | Sign up | Log in

giulianarancic Follow

giulianarancic When the night calls for a hot pair of jeans and heels 🍷🍷 (update for those asking: shoes are @louboutinworld / jeans are on HSN.com search item 537-819)

load more comments

jwoww Love!
madeleinecia Giuliana do you think that everyone that wear legging need to wear a long shirt to cover our butt ?
kiaratolliver Legs!!!! 🍷🍷
giulianarancic @jwoww Thanks girl! Hope you are doing well!!!!
giulianarancic @yamilewellman yes, they do!
giulianarancic @mcgrawlovinmichele they won't be too long. They run short to begin with!

19,899 likes
3 DAYS AGO

Log in to like or comment.

11. Endorser: Sofia Vergara
Brand: Sofia Vergara Perfume, Perfumania
Followers: 12.8m



The image shows a screenshot of an Instagram post by Sofia Vergara. On the left is a photograph of Sofia Vergara sitting in a car, wearing a green and white floral off-the-shoulder dress, holding a phone with a floral case. On the right is the post's interface, including her profile picture, name, a 'Follow' button, the caption, comments, and like count.

Instagram | Search

sofiavergara [Follow](#)

sofiavergara My husband thinks its funny..but I think is beautiful🥰🥰🥰
#matchingeverything 🍷🍷
#weddingweekend #DanaandMilena♥
@dolcegabana

load more comments

missbettyspage I love it too Sofia 🍷

rebbe.la @linstagram_

daniela.costasantos Another beautiful dress. You have a good taste.

marwim_miranda_marwuez Ola toti

deb6366 I second that!!!!♥

erika_amador_Pretty

maximilianvargas Cute! 🍷🍷🍷🍷

soleii_tje Ja think its beautiful too

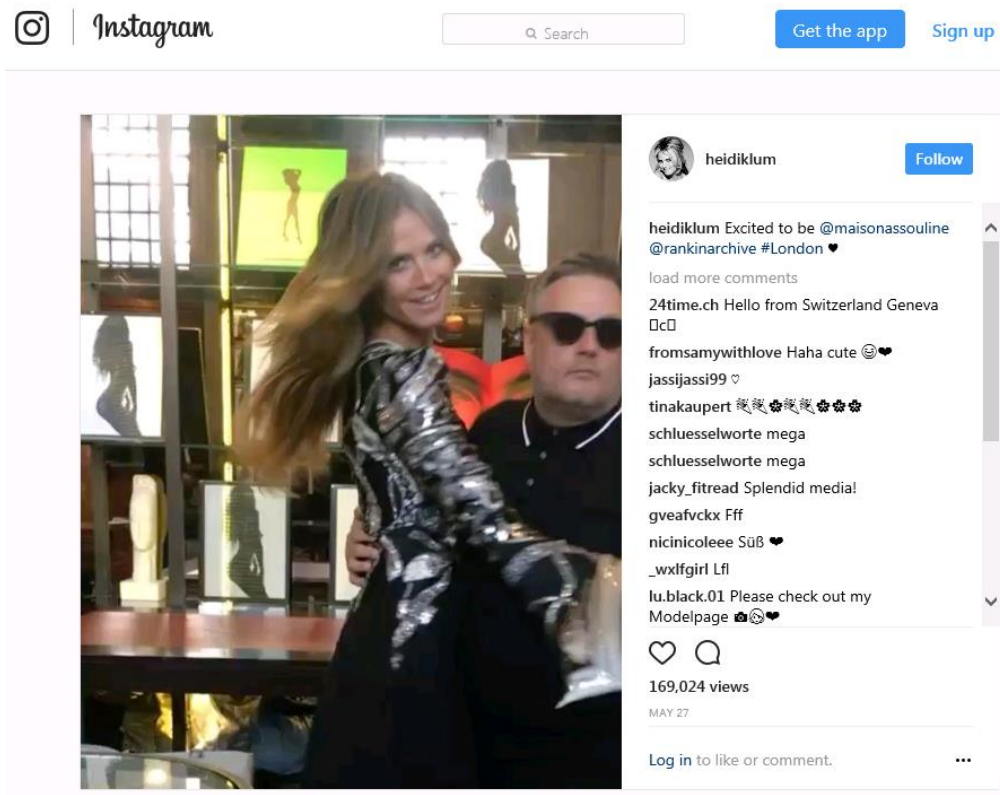
thegoddessraising I think is gorgeous!!!!!!

197,760 likes

JUNE 9

Add a comment...

12. Endorser: Heidi Klum
Brand: Rankin
Followers: 3.7m



The image shows a screenshot of an Instagram post by Heidi Klum. On the left is a photograph of Heidi Klum in a shiny, metallic dress, smiling, with a man in sunglasses standing next to her. On the right is the post's interface, including her profile picture, name, a 'Follow' button, the caption, comments, and view count.

Instagram | Search | [Get the app](#) | [Sign up](#)

heidiklum [Follow](#)

heidiklum Excited to be @maisonassouline @rankinarchive #London ♥

load more comments

24time.ch Hello from Switzerland Geneva 🇨🇭

fromsamywithlove Haha cute 🥰♥

jassijassi99 ♥

tinakaupert 🍷🍷🍷🍷

schluesselworte mega

schluesselworte mega

jacky_fitread Splendid media!

gveafvckx Fff

nicinicoleee Süß ♥

_wxlfgirl Lfi


lu.black.01 Please check out my Modelpage 🍷🍷♥

169,024 views

MAY 27

Log in to like or comment.

13. Endorser: Rach Parcell
 Brand: Rachel Parcell clothing
 Followers: 927k



Instagram | Search | Get the app | Sign up

rachparcell
 Monarch Bay | Follow

Sharing a bunch of cute (and a few hilarious) photos from our beach day in California on my blog!! The link to the full post and my swimsuit and kimono that's under \$20 is in my profile! 🥰🌟 #beachday #california #monarchbeachresort

load more comments

discodaydream This is so sweet💕

ririduck This is adorable

paigenicollephoto Oh my goodness, this is beautiful!

ivwani So cute 😊

cesiah_koris @rachparcell thank you! Very helpful.

christi_herron So gorgeous! And oh so sweet! 🥰

mariposa23_ 😊😊

11,094 likes
 MAY 25

Log in to like or comment. ...

14. Endorser: Jenni Farley
 Brand: Australian Gold
 Followers: 5.2m



Instagram | Search | Profile | Heart | User

jwoww | Follow

No time to tan today! Color on the go!

load more comments

ivone716 Ugh i need some.
 @madalynhudsons03 is this really good

geniacasella Can these be purchased in Australia @jwoww 🇺🇸❤️

mimartin0612 How's the smell? That's always my issue with the daily moisturizer with tanning/renting. They smell like tanner not a nice refreshing lotion.

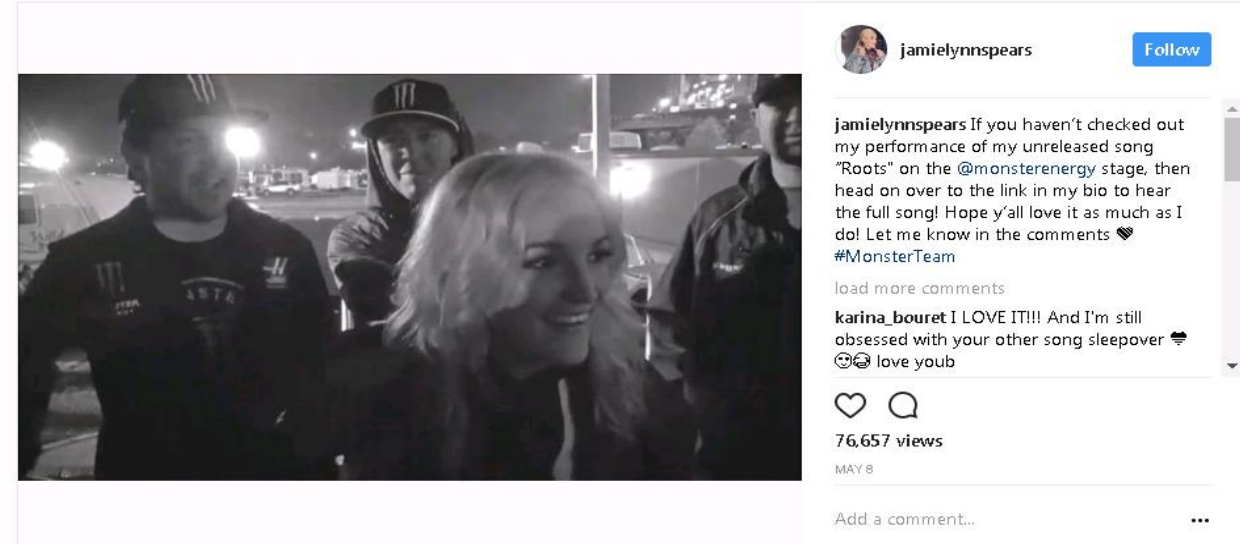
madalynhudsons03 @ivone716 most definitely !!! It smells really good isn't overwhelming either!!!! I actually have to take breaks in between my tans because it keeps my tan lasting long !!! Not orange either !!!!

that_on1e_girl @jwoww love love love 😊

9,750 likes
 MAY 1

Add a comment... ...

15. Endorser: Jamie Lynn Spears
Brand: Monster Energy
Followers: 1.4m



Instagram | Search

jamielynspears Follow

jamielynspears If you haven't checked out my performance of my unreleased song "Roots" on the @monsterenergy stage, then head on over to the link in my bio to hear the full song! Hope y'all love it as much as I do! Let me know in the comments 💕 #MonsterTeam

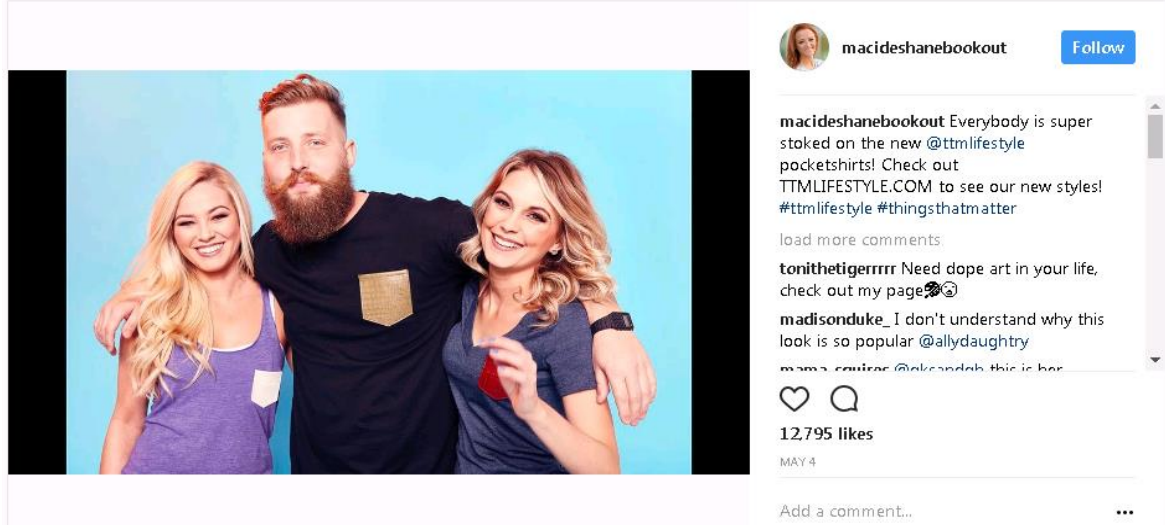
load more comments

karina_bouret I LOVE IT!!! And I'm still obsessed with your other song sleeper 🥰 😊 love you!

76,657 views
MAY 8

Add a comment...

16. Endorser: Maci DeShane Bookout
Brand: TTM Lifestyle
Followers: 3.7m



Instagram | Search

macideshanebookout Follow

macideshanebookout Everybody is super stoked on the new @ttmlifestyle pocketshirts! Check out TTMLIFESTYLE.COM to see our new styles! #ttmlifestyle #thingsthatmatter

load more comments

tonithetigerrrr Need dope art in your life, check out my page 🎨👀

madisonduke_ I don't understand why this look is so popular @allydaughtry

12,795 likes
MAY 4

Add a comment...

17. Endorser: Tiona Fernan
Brand: Sneaky Vaunt
Followers: 446k



Instagram interface showing a post by user **xttiona**. The post features a woman with long dark hair wearing a light-colored strapless bra. The caption reads: "xttiona ☐☐♥ Backless, Strapless, AND Cleavage? Shut the front door @sneakyvaunt. AND 20% off?! Today is totally my day! Ladies, the time is now to get that cleavage on point w/ sneakyvaunt.com". The post has 14,375 likes and is dated MAY 24. Comments include: "the_lou 😍😍😍", "coreystokes100 Makes no sense to be this gorgeous 🥰🥰🥰", "kaydenwoon21 I love u", "neilduns Hey sexy, smile one time 🥰", "charlottexcowley 😍😍", "christen_shorting24 😍😍", "perfect_gent78 ☐", and "doogydoug972 Big And Nice boobs deserve this accessory".

18. Endorser: Nicole Polizzi
Brand: STK, The ONE Group
Followers: 10.3m



Instagram interface showing a post by user **snooki**. The post features a man and a woman sitting at a restaurant table with several plates of food. The caption reads: "snooki Had the best dinner with my squirrel friend @mister79 I ❤️♥️ Thanks for the delicious meal @eatstk @theonegroup @mister79 @itshappeningpodcast". The post has 64,305 likes and is dated 5 DAYS AGO. Comments include: "mrs.nandi @i00nylovegood no I'm not mad at all. And I dont want to go out without my husband.", "mrs.nandi @leightinbby I'm happily married thank you", "leightinbby @mrs.nandi fix ya bio then lmao", and "mrs.nandi @leightinbby don't need to. It doesn't say I'm single. In fact I have lots of pictures on my husband and I. So don't worry about me. My comment was towards snooki, no need to jump to her defense I think she can handle it herself 😊".

19. Endorser: Amber Rose
Brand: Flirt Cosmetics
Followers: 15.2m

Instagram | Search

amberrose Follow

amberrose "Molten Chic" Eyeshadows are out NOW!!! Click the link in the bio @flirtcosmetics 😍😍😍 Makeup by @priscillaano

load more comments

fairrowjames Pretty

isabellajordan616 Ur smile 😍❤️😍

hotcommodity_ri Imma need you to share her

tangimantama hey Amber. Looking beautiful as always, my dreams are, to be you one day.

batman_fanpage It made no difference and you guys saying love that eyeshadow tho like wtf😍😍

dats_my_word Ayo I fuckin love yo face Amber! Perfect

898,863 views
MAY 9

Add a comment...

20. Endorser: Vanessa Hudgens
Brand: Whispering Angel
Followers: 26.1m

Instagram | Search

vanessahudgens Following

vanessahudgens 6 bottles of whispering angel in...😍😍

load more comments

julie3001 Goals !!

x_jsjsjs_x 🍷

nd650290 Love ❤️

macyfout @brently_b

brently_b @macyfout

ashikhasanbabun 🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷🍷


popular9821 Salam

natamaxa 🍷

737,418 likes
MAY 28

Add a comment...

21. Endorser: Valentina Vignali
 Brand: Women's Best
 Followers: 975k



Instagram | Search

valentinavignali
 Gallipoli, Italy [Follow](#)


valentinavignali Workout never stops
 @womensbest.it 🇮🇹🇮🇹🇮🇹 #womensbest
 #workoutmotivation #healthylife

load more comments

filippo.buson Tvb sei bellissima prodotto
 fabiocassa_sfh Soooooooooooooos 😍😍😍😍
 adelaide_natalia Seguitemi se vi va 😊
 paulsimon3686 La faccia di chi vuole tanti
 soldi fino ad annegarci dentro
 rodrigo_pr07 Bellísima!
 alessia_fiordispina_ 😍😍 @valentinavignali
 bellucci_agency 🙌🙌🙌
 moda_aprea Ciao a tutte se vi va seguitemi
 sn un contatto moda ♡
 qureshikal7 hi
 kale.piu Kdk 1de

35,859 likes
 JUNE 6
 Add a comment...

22. Endorser: Lilly Ghalichi
 Brand: Ryan and Walter
 Followers: 2.7m



Instagram | Search

lillyghalichi [Follow](#)


lillyghalichi BTS Shooting before our big
 day ❤️ with @dukeimages at a gorgeous
 @weddingstates venue. ✨ Gown by
 @ryanandwalter Bridal Couture 📷 I can't
 wait to share all the photos and videos with
 you guys. #GhalichiGlam

load more comments

jackedelsa @coll_boll_ look at her account
 holy beautiful
 ahuahanna @ianh10 me and you at our
 wedding

1,210,563 views
 MAY 7
 Add a comment...

23. Endorser: Behati Prinsloo
 Brand: Juicy Couture
 Followers: 5.1m



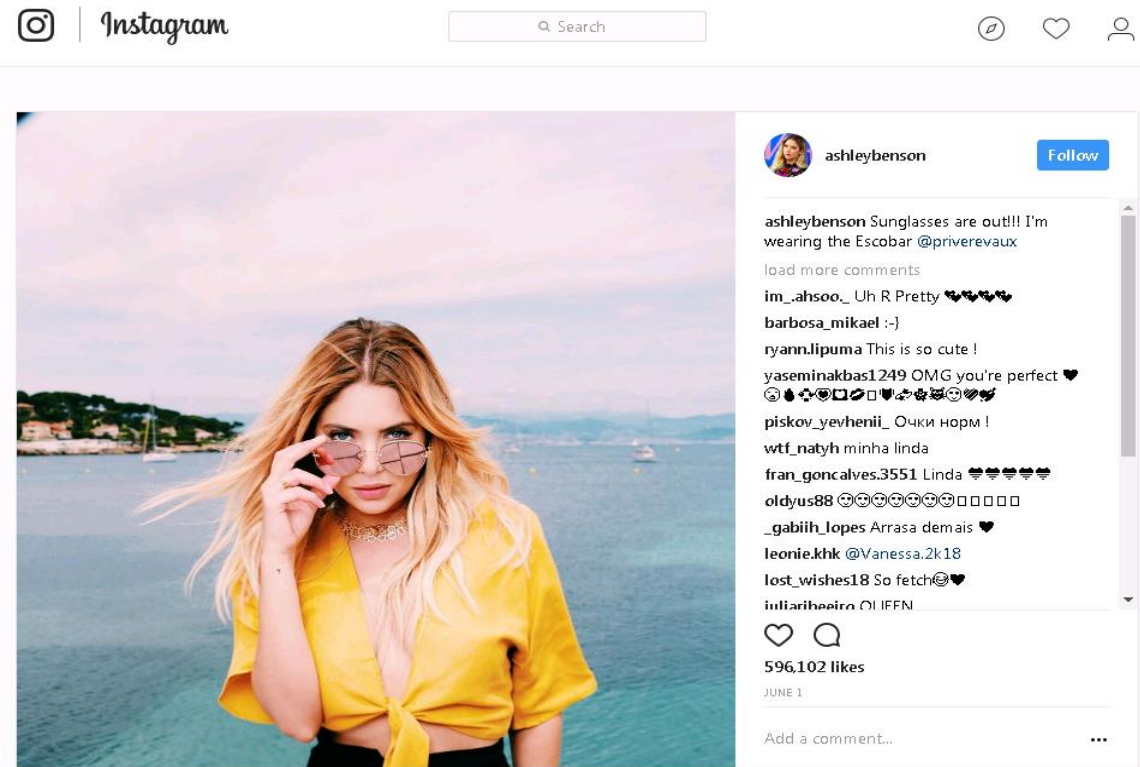
Instagram interface showing a post by behatiprinsloo. The post features a large image of a Juicy Couture perfume bottle with a leopard print design and a smaller image of a matching perfume bottle with heart-shaped sunglasses. The caption reads: "Celebrating my first Mother's Day as a mom is soooo wild. I know my mini me will get into all my perfumes soon enough. Love to all the moms out there, we are all warriors 🍀💕 #ilovejuicycouture #happymothersday". The post has 56,318 likes and is dated MAY 12.

24. Endorser: Anna Petrosian
 Brand: Ice Link, Converse
 Followers: 1.5m



Instagram interface showing a post by annapetrosian_. The post features a close-up image of a person's feet wearing white sneakers and a blue quilted handbag. The caption reads: "Pic inspired by @suzysoyoyan 🥰 Watch @icelinkofficial Sneakers @converse Bag @chanelofficial". The post has 3,168 likes and is dated JUNE 11.

28. Endorser: Ashley Benson
 Brand: Prive Revaux
 Followers: 16.9m




29. Endorser: Emily Ratajkowski
 Brand: Marc Jacobs
 Followers: 13.5m



30. Endorser: Denice Moberg
Brand: GymShark
Followers: 716k

Instagram Search



deniceoberg Follow

deniceoberg I tried to train back today, it's my second time since the surgery and it gets better but I took it super easy anyway ☐☐💎 I really liked this one, I got pretty good contact when I dropped the weight and used the band instead. My bands are from @bootybuilder.no


load more comments

katharina.____@sophiia.____
nyssa796102 Bands are everything
renewhuis01 Nice!☐☐☐
timstolk @jolielisabeth kan je er ook mee doen
siberia.msk ☐☐
mumsworld2 Nice
natsssno Great alternative to the usual rowing 😊

155,731 views
MAY 21
Add a comment...

31. Endorser: Scott Disick
Brand: Jet Lux Life
Followers: 20m

Instagram Search



letthelordbewithyou Follow

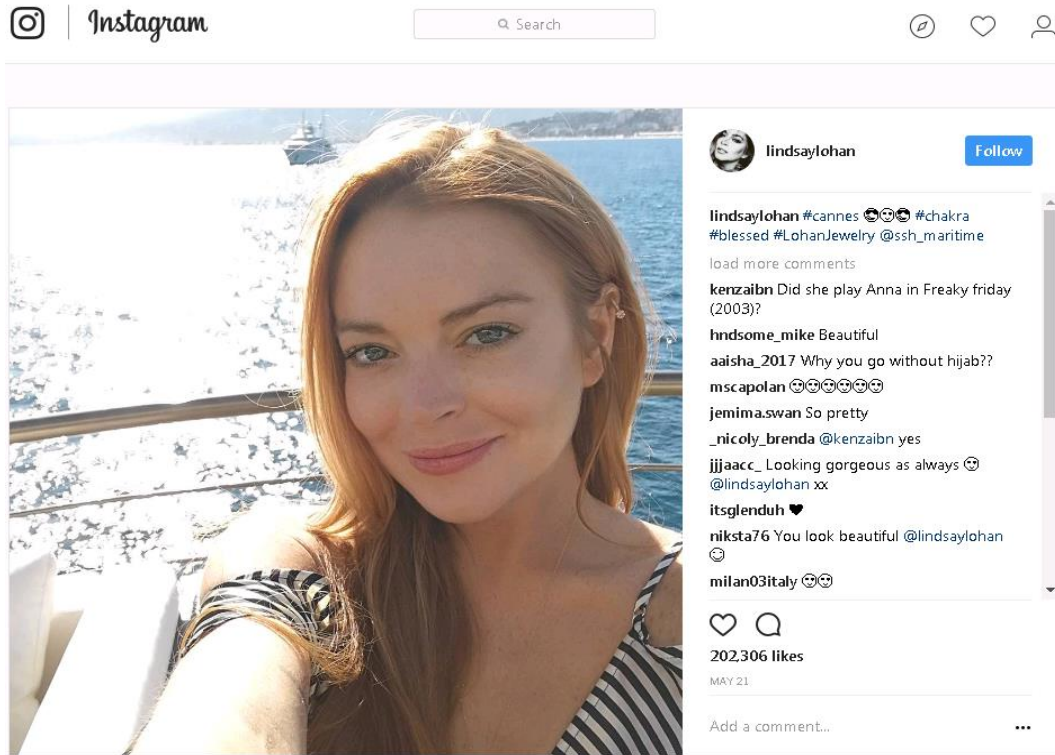
letthelordbewithyou Vegas we r on the way @liquidlv @1oaklv thanks @jetluxlife for the little G5

load more comments

poncimisca First
amy.93 Huh 😊
tila.tequila89 Lb
illsmxo ❤️❤️❤️
aymoox 🍷🍷🍷🍷
zirrcox 🍷🍷
flowersooox 🍷🍷🍷
peaceoubcox 🍷🍷🍷🍷
virginiagee90 Lb
kerem_w Go fuck your self bitch
illsmxo ❤️🍷🍷🍷
dredav1123 @kwilli6

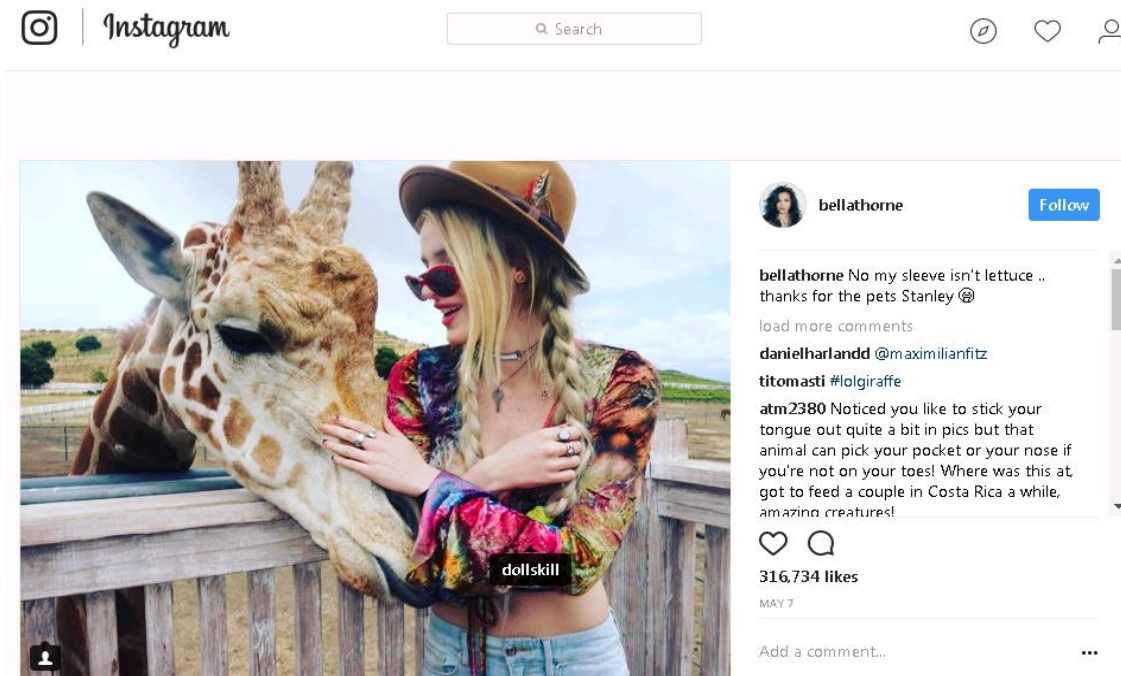
157,001 likes
MAY 20
Add a comment...

32. Endorser: Lindsay Lohan
Brand: SSH Maritime
Followers: 6.1m



The image shows a screenshot of an Instagram post by Lindsay Lohan. The post features a selfie of her on a boat, wearing a black and white striped top. The interface includes the Instagram logo, a search bar, and navigation icons. The post content shows her profile name, a 'Follow' button, and a caption with hashtags #cannes, #chakra, #blessed, #LohanJewelry, and @ssh_maritime. There are several comments from users like kenzaibn, hndsome_mike, aaisha_2017, mscapolan, jemima.swan, _nicoly_brenda, jjjaacc, itsglenduh, niksta76, and milan03italy. The post has 202,306 likes and is dated May 21.

33. Endorser: Bella Thorne
Brand: Dolls Kill
Followers: 15.7m



The image shows a screenshot of an Instagram post by Bella Thorne. The post features a photo of her wearing a colorful, patterned top and a hat, interacting with a giraffe. The interface includes the Instagram logo, a search bar, and navigation icons. The post content shows her profile name, a 'Follow' button, and a caption mentioning 'Stanley' and 'pets'. There are several comments from users like danielharlandd, titomasti, and atm2380. The post has 316,734 likes and is dated May 7.


34. Endorser: Sophia Bush
 Brand: Listerine
 Followers: 2.9m



35. Endorser: Zendaya
 Brand: Jet Lux Life
 Followers: 42.3m



36. Endorser: Massy Arias
 Brand: Listerine
 Followers: 2.2m



massy.arias [Follow](#)

massy.arias In partnership with #Listerine, I'm pumped to remind all of you to #UnlockYourBold! 🗨️ Your morning routine can help set the tone for the entire day. I'm getting ready for the gym, where I'm continuing to build the best version of myself! But before I head out, I swish and shuffle to get my mind right – and obviously because it's fun, ha! 🤪 Be bold mi gente, take a small moment to remind yourself that every day. #bestself #bounceback #igotthis 🖤

load more comments

viriya_leela Wow

daydreamboutme @fitnesssteph7

eryndesroches Kind of shocked by this... 🤔

houseagnesno1j Oh so Beautiful 😍😍

vivir.con.pasion @massy.arias Yasssss

👍 🗨️

137,897 views

5 DAYS AGO

Add a comment...

37. Endorser: Farrah Abraham
 Brand: Beverly Hills Rejuvenation Center
 Followers: 918k



farrah_abraham [Follow](#)

farrah_abraham Summer got me like 🤩 love my secret @beverlyhillsrejuvenationlv @cdanisan #rejuvenate #summer 🤩🤩🤩🤩

load more comments

janelkelly8956 Stupid

allupinmybizznez Cut your head odd. That will fix your whole body.

bootleg_barbie_ @hugyourhaters lolol I'm 46 and my mom can still ground me!!! That's the difference of respect. I try so hard to find some thing to like. She is ambitious but is it a good ambition?

rachaelmoniz Does that hurt??

kelssjohnston Or why don't you just workout... I swear people will do anything to look good other than actually workout and eat right. Which costs way less than

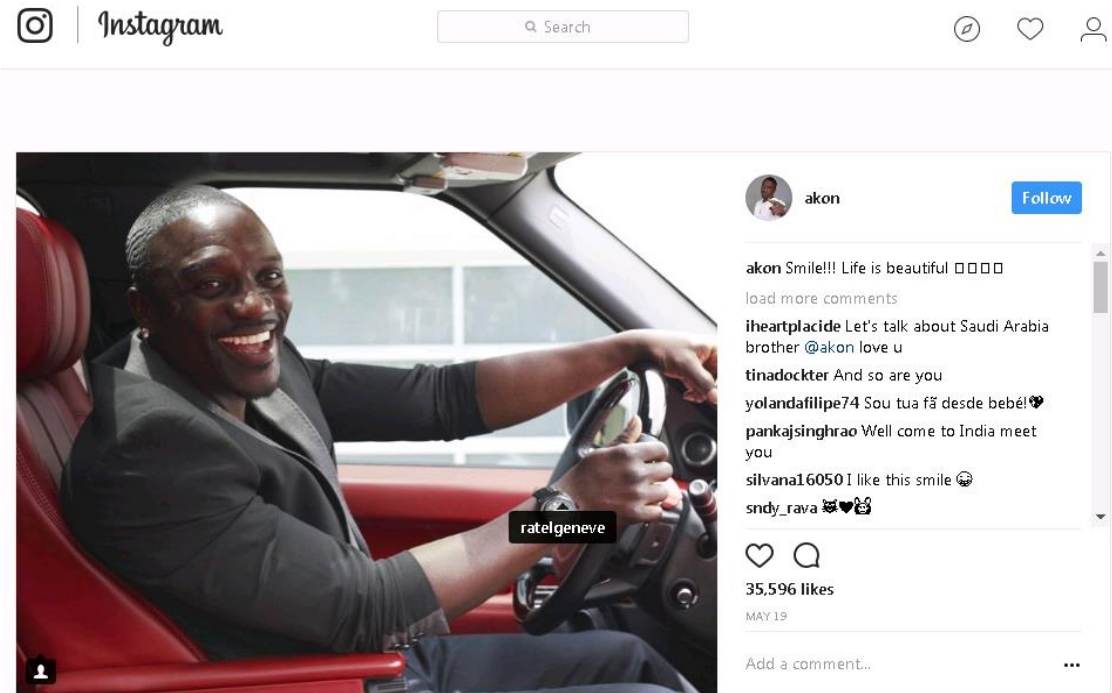
👍 🗨️

403,255 views

MAY 25

Add a comment...

38. Endorser: Akon
Brand: Ratel Geneve
Followers: 3.2m



Instagram | Search

akon Follow

akon Smile!!! Life is beautiful □□□□
load more comments

iheartplacide Let's talk about Saudi Arabia brother @akon love u

tinadockter And so are you

yolandafilipe74 Sou tua fã desde bebé!❤️

pankajsinghrai Well come to India meet you

silvana16050 I like this smile 🌟

sndy_rava 🌟❤️👍

35,596 likes
MAY 19

Add a comment...

39. Endorser: Jennifer Lopez
Brand: Valentino, Harry Winston
Followers: 66.5m



Instagram | Search

jlo Follow

jlo VALENTINO. HARRY WINSTON.
#MetGala2017

load more comments

tonyariddick □□□❤️❤️❤️❤️

linodoesit Ooooooog

kismicu Beautifull

piotr_i_pawel_cielatkowski 🌟

jagdeep17335 Lovly pic

les_jenn_fromthebloock Hermosa.

les_jenn_fromthebloock I love you.

les_jenn_fromthebloock Queen.

les_jenn_fromthebloock Hermosa

les_jenn_fromthebloock Jlp


_madeline_marie Love love love ❤️❤️❤️

alsaheb_alaa Oh

755,238 likes
MAY 1

Add a comment...

40. Endorser: Vanessa Lachey
 Brand: The Home Edit
 Followers: 561k



vanessalachey [Follow](#)

vanessalachey My #wcv goes out to the ladies of @thehomeedit Joanna & Clea! They were the calm in my storm and are the beginning of a positive change in the Lachey Home. 🌟 We have been renovating for awhile now and to say it was a nightmare is an understatement! 😩 We are still in the midst of work being done. Even in this photo the cabinets on top have no paint and no glass. But that's not what's important. My family loves being in our new space. We spend most of our time in the kitchen. It's the heart of our home. So to have them help me organize it was such a blessing! Our house is not done yet, but it's never to late to get organized. Now every morning is like Christmas morning when we open the cabinets! Cam is even rockin his Christmas pj's! Love you girls! ❤️

load more comments

👍 🗨️

13,885 likes

MAY 10

Add a comment...

41. Endorser: Victoria Beckham
 Brand: Estee Lauder, Victoria Beckham
 Followers: 16m



victoriabeckham [Follow](#)

victoriabeckham Mummy and me 🤍 Thank u @nlvogue x VB

load more comments

sb99phantom7119 Sweet.

alexapj9812 So sweet harper 🤍🤍

tiaaddict911 So cute 🤍🤍

babycentre So cute. xx

aaraceli.gonzalez 🤍

perpetuallyembarrassedghost Cuties!!!

chenzhixuan_ so cute🤍🤍🤍🤍

la_mascia 🤍

8233_mmm 😊😊 Aww

catwalk_101 Love this @victoriabeckham 🤍

patryy2123 🤍

wilhelminalouiseffashion 🤍🤍🤍

👍 🗨️

534,011 likes

MAY 6

Log in to like or comment.

42. Endorser: Lisa Rinna
 Brand: Teami Blends
 Followers: 1.1m

The screenshot shows an Instagram post from Lisa Rinna (@lisarinna). The main image shows her sitting on a sofa, wearing a grey cardigan and sunglasses, holding a red and white Teami Blends water bottle. The post has 5,542 likes and was posted on May 4. The caption reads: "It's been over a year and I'm still going strong with my @teamiblends detox tea! I'm always headed out somewhere and their tumbler is so convenient to just grab and go. Just in time for Mother's Day or your next vacation, you can use code RINNA for 15% off yours. #thankyouteami #teampartner". There are several comments from users like rob_artist, hannahable, dawgscoop, brendabradly, glamtoyourglow, and susan.smith166.

43. Endorser: Chelsea Houska
 Brand: Loved by Hannah and Eli Incorporated
 Followers: 4.6m

The screenshot shows an Instagram post from Chelsea Houska (@chelseahouska). The main image shows a baby lying on a patterned blanket, wearing a grey t-shirt with "BABY BEAR" printed on it and holding colorful rings. The post has 827,787 views and was posted on May 31. The caption reads: "He's quite the talker/yeller *cute onesie is from @lovedbyhannahandeli". There are several comments from users like kellymariecottrell, iam_iq, cindy_miller3, shelby.dianne, bennylusnataly, kaym3z, haley.rae9, and kalligur129.

44. Endorser: Kristin Cavallari

Brand: Nordstrom

Followers: 2.7m



Search



kristincavallari

Follow

kristincavallari Starting to think Cam might actually grow up to be a photographer 😊 ||
 ☐ Cam Cutler || shoes are from my line
 #TastefulShoe @nordstrom
 @chineselaundry

load more comments

iammattjustmatt ☐☐☐☐☐☐

t_r_i_s_h i like her sandals @krystelize

ek2402 Would love to know what skincare you use Kristin? I use only organic products but am starting to look so oooooold 🙄🙄 do you use any 'anti aging' products?

jennnrosie @ek2402 Rodan + Fields is the ☐☐ the Redefine Line is amazing for anti aging

dannymonteagudo Always lovely.

alyson_marie_de_silva Why are comments rff? Did something happen? Drama iust



40,087 likes

MAY 21

Add a comment...

Appendix C

All undisclosed posts made by influencers after receiving the FTC's letter:

1. Nicky Jam:

<https://www.instagram.com/p/BT2yrrkjQyf/>

<https://www.instagram.com/p/BTpeLIUj869/?taken-by=nickyjampr>

<https://www.instagram.com/p/BUJ3oIYj8ce/>

2. Jen Selter:

<https://www.instagram.com/p/BU5UpaZhv3k/?taken-by=jenselter>

<https://www.instagram.com/p/BUihUxBBtFO/?taken-by=jenselter>

<https://www.instagram.com/p/BVFfaGMRBAIZ/?taken-by=jenselter>

https://www.instagram.com/p/BVDZL_Khrw4/?taken-by=jenselter

3. Sean Combs:

<https://www.instagram.com/p/BTnQDuwjz-1/?taken-by=diddy>

<https://www.instagram.com/p/BTpRQl6DAJp/?taken-by=diddy>

<https://www.instagram.com/p/BTtzQ1gD6yc/?taken-by=diddy>

<https://www.instagram.com/p/BTt3GXEDlnY/?taken-by=diddy>

<https://www.instagram.com/p/BTuG7eLj-hN/?taken-by=diddy>

<https://www.instagram.com/p/BTuPyohD6Lh/?taken-by=diddy>

<https://www.instagram.com/p/BTubKBNDJ5/?taken-by=diddy>
<https://www.instagram.com/p/BTvBwbLjpW0/?taken-by=diddy>
<https://www.instagram.com/p/BTvc2kUDZoU/?taken-by=diddy>
<https://www.instagram.com/p/BTzvLJ2j0Oi/?taken-by=diddy>
<https://www.instagram.com/p/BT6diYjj5Xn/?taken-by=diddy>
https://www.instagram.com/p/BT7Hi_sjAkh/?taken-by=diddy
<https://www.instagram.com/p/BUK1b6fDdMg/?taken-by=diddy>
<https://www.instagram.com/p/BUM7nhiDRq4/?taken-by=diddy>
<https://www.instagram.com/p/BUfm8V0j5t0/?taken-by=diddy>
<https://www.instagram.com/p/BU-NPpgjhqg/?taken-by=diddy>
<https://www.instagram.com/p/BVOJwWHjMfo/?taken-by=diddy>

4. Shay Mitchell:

<https://www.instagram.com/p/BT4I71IB5dc/?taken-by=shaymitchell&hl=en>
<https://www.instagram.com/p/BUKns3yB7F4/?taken-by=shaymitchell&hl=en>
https://www.instagram.com/p/BUTmZ_UhtD/?taken-by=shaymitchell&hl=en
<https://www.instagram.com/p/BUfWeL-Bsci/?taken-by=shaymitchell&hl=en>
https://www.instagram.com/p/BUhro_vhy1z/?taken-by=shaymitchell&hl=en
<https://www.instagram.com/p/BUiPUQyB7B6/?taken-by=shaymitchell&hl=en>
<https://www.instagram.com/p/BUj40FHhftM/?taken-by=shaymitchell&hl=en>
<https://www.instagram.com/p/BUndzRlh7yd/?taken-by=shaymitchell&hl=en>
<https://www.instagram.com/p/BUu9XSshOHD/?taken-by=shaymitchell&hl=en>
<https://www.instagram.com/p/BVADymeBlex/?taken-by=shaymitchell&hl=en>
<https://www.instagram.com/p/BTHqdkghViC/?taken-by=shaymitchell&hl=en>

5. Ciara:

https://www.instagram.com/p/BT2268Cg_hd/?taken-by=ciara&hl=en

6. Dorothy Wang:

<https://www.instagram.com/p/BUAXyS5Bm3S/?taken-by=dorothywang&hl=en>
https://www.instagram.com/p/BUyk_peBeNx/?taken-by=dorothywang&hl=en
https://www.instagram.com/p/BU0ZH-Dh_42/?taken-by=dorothywang&hl=en
<https://www.instagram.com/p/BU-v-X-h2nt/?taken-by=dorothywang&hl=en>

7. Luke Bryan:

<https://www.instagram.com/p/BUR6k8rDBfJ/?taken-by=lukebryan&hl=en>

8. Kristin Cavallari:

https://www.instagram.com/p/BUXNc0IDV_E/?taken-by=kristincavallari&hl=en
https://www.instagram.com/p/BU0IZjUD3F_/?taken-by=kristincavallari&hl=en
<https://www.instagram.com/p/BU2ILdkjuIM/?taken-by=kristincavallari&hl=en>
<https://www.instagram.com/p/BUfnFw0jSub/?taken-by=kristincavallari&hl=en>
<https://www.instagram.com/p/BUrbCdGDDZy/?taken-by=kristincavallari&hl=en>
https://www.instagram.com/p/BUw0S_Ajl8K/?taken-by=kristincavallari&hl=en
<https://www.instagram.com/p/BVH-f4mDsiD/?taken-by=kristincavallari&hl=en>
<https://www.instagram.com/p/BVIOQZYRDLk/?taken-by=kristincavallari&hl=en>

<https://www.instagram.com/p/BVC6MHXD3BO/?taken-by=kristincavallari&hl=en>
<https://www.instagram.com/p/BVNpi6rDeyc/?taken-by=kristincavallari&hl=en>
https://www.instagram.com/p/BVIQZYRDLk_/?taken-by=kristincavallari&hl=en

9. Caroline Manzo:

https://www.instagram.com/p/BURnQ2_D8U1/?taken-by=carolinemanzo&hl=en

10. Lucy Hale:

<https://www.instagram.com/p/BUpOcYIFWrJ/?taken-by=lucyhale&hl=en>
<https://www.instagram.com/p/BTo0LORF9Fs/?hl=en&taken-by=lucyhale>
<https://www.instagram.com/p/BU1qddw11PW/?taken-by=lucyhale&hl=en>
https://www.instagram.com/p/BU4X_LsIS86/?taken-by=lucyhale&hl=en

11. Naomi Campbell:

<https://www.instagram.com/p/BUpTqzrgh9F/?taken-by=iamnaomicampbell&hl=en>
<https://www.instagram.com/p/BUpbk2wApeB/?taken-by=iamnaomicampbell&hl=en>
<https://www.instagram.com/p/BUvHg-agtaF/?hl=en&taken-by=iamnaomicampbell>

12. Giuliana Rancic:

<https://www.instagram.com/p/BT2hzceF527/?taken-by=giulianarancic&hl=en>
<https://www.instagram.com/p/BUzf5oGlyQ7/?taken-by=giulianarancic&hl=en>
<https://www.instagram.com/p/BU1z3aclL2Z/?taken-by=giulianarancic&hl=en>
https://www.instagram.com/p/BVOZB4qIT_S/?taken-by=giulianarancic&hl=en

13. Sofia Vergara:

<https://www.instagram.com/p/BTr2lCcF4qG/?taken-by=sofiavergara&hl=en>
<https://www.instagram.com/p/BTsKg0blGuo/?taken-by=sofiavergara&hl=en>
<https://www.instagram.com/p/BTsZPwTFZjA/?taken-by=sofiavergara&hl=en>
<https://www.instagram.com/p/BTsf-4NI8MZ/?taken-by=sofiavergara&hl=en>
<https://www.instagram.com/p/BTsn2nZlFRs/?taken-by=sofiavergara&hl=en>
<https://www.instagram.com/p/BTsoZ2SF-Fr/?taken-by=sofiavergara&hl=en>
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<https://www.instagram.com/p/BVI5FhqF5W-/?taken-by=sofiavergara&hl=en>

14. Heidi Klum:

<https://www.instagram.com/p/BUmZ1GAgZt/?taken-by=heidiklum&hl=en>
<https://www.instagram.com/p/BVAqPDWg0iD/?taken-by=heidiklum&hl=en>

15. Rachel Parcell:

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16. Jenni Farley:

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<https://www.instagram.com/p/BUZIRzVjmLP/?hl=en>
<https://www.instagram.com/p/BU1rfQLDB33/?taken-by=jwoww&hl=en>

17. Jamie Lynn Spears:

<https://www.instagram.com/p/BT2IJcWD-30/?taken-by=jamielynnspears&hl=en>
<https://www.instagram.com/p/BUScxLyjMuA/?taken-by=jamielynnspears&hl=en>

18. Maci Bookout:

<https://www.instagram.com/p/BTrOTUpDhgj/?taken-by=macideshanebookout&hl=en>
<https://www.instagram.com/p/BULQXaJDjd8/?taken-by=macideshanebookout&hl=en>
<https://www.instagram.com/p/BUqJmPujpQA/?taken-by=macideshanebookout&hl=en>

19. Tiona Fernan:

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20. Nicole Polizzi:

<https://www.instagram.com/p/BTkCGFgBDRy/?taken-by=snooki&hl=en>
<https://www.instagram.com/p/BVESc5ZBV9z/?taken-by=snooki&hl=en>

21. Amber Rose:

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<https://www.instagram.com/p/BT7Rv8mDaLK/?taken-by=amberrose&hl=en>
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22. Vanessa Hudgens:

https://www.instagram.com/p/BUpUf_sDaE4/?taken-by=vanessahudgens&hl=en

23. Valentina Vignali:

<https://www.instagram.com/p/BTjFWC1A5WV/?taken-by=valentinavignali>
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24.Lilly Ghalichi:

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25. Behati Prinsloo:

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<https://www.instagram.com/p/BUAkP08gehp/?taken-by=behatiprinsloo&hl=en>

26. Anna Petrosian:

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<https://www.instagram.com/p/BVN1eXyBF4P/?hl=en&taken-by=annapetrosian>

27. Troian Bellasario:

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<https://www.instagram.com/p/BUCDb07BWiu/?taken-by=sleepinthegardn&hl=en>

28. Nina Agdal:

<https://www.instagram.com/p/BTzhdhPAQ7T/?hl=en>

29. Ashley Benson:

<https://www.instagram.com/p/BT6tw5PDBEs/?taken-by=ashleybenson&hl=en>
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<https://www.instagram.com/p/BUhTDVvDNuy/?taken-by=ashleybenson>

30. Emily Ratajkowski:

<https://www.instagram.com/p/BTmCg6yFhUf/?taken-by=emrata&hl=en>

31. Denice Moberg:

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<https://www.instagram.com/p/BVIP8Hbhv9P/?taken-by=deniceemoberg&hl=en>
<https://www.instagram.com/p/BVMi4ImBrn4/?taken-by=deniceemoberg&hl=en>

32.Scott Disick:

<https://www.instagram.com/p/BUODSBVhRCX/?hl=en&taken-by=letthelordbewithyou>
<https://www.instagram.com/p/BUUyBUTBaA4/?taken-by=letthelordbewithyou&hl=en>
https://www.instagram.com/p/BVK-2_2BAsc/?taken-by=letthelordbewithyou&hl=en

33.Lindsay Lohan:

https://www.instagram.com/p/BUR8Ga_g9CR/?taken-by=lindsaylohan&hl=en
<https://www.instagram.com/p/BUVasgOAnHX/?taken-by=lindsaylohan&hl=en>
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<https://www.instagram.com/p/BUrhBbvgyfI/?taken-by=lindsaylohan&hl=en>

34.Bella Thorne:

<https://www.instagram.com/p/BUczLQtAnf4/?taken-by=bellathorne&hl=en>
<https://www.instagram.com/p/BTzbhKigSYp/?hl=en&taken-by=bellathorne>

35.Zendaya:

<https://www.instagram.com/p/BT0YOWJhcEZ/?taken-by=zendaya&hl=en>
<https://www.instagram.com/p/BUHyeUvhKwa/?taken-by=zendaya&hl=en>

36.Sophia Bush:

<https://www.instagram.com/p/BT7DD43DoyK/?taken-by=sophiabush&hl=en>
<https://www.instagram.com/p/BUdbTx6D0IP/?hl=en&taken-by=sophiabush>
<https://www.instagram.com/p/BUc8LWMDNxs/?hl=en&taken-by=sophiabush>
<https://www.instagram.com/p/BT7DD43DoyK/?taken-by=sophiabush>

37.Massy Arias:

<https://www.instagram.com/p/BVFKNFEAcoi/?taken-by=massy.arias&hl=en>

38.Farah Abraham:

https://www.instagram.com/p/BTjI TRIAmPM/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTmpt7GgJel/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTrO7_agFR7/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTthnbHApGg/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTvcLF-AR8q/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTvtXvIA-ky/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BUgL1wnAsUh/?taken-by=farrah_abraham&hl=en

https://www.instagram.com/p/BU6yu0ZAzOL/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BU6zIREgFWe/?taken-by=farrah_abraham&hl=en

39.Lisa Rinna:

<https://www.instagram.com/p/BTjcNoAB5K6/?taken-by=lisarinna&hl=en>
<https://www.instagram.com/p/BTuNm22Bu6d/?taken-by=lisarinna&hl=en>
<https://www.instagram.com/p/BUX7tRZhIM0/?taken-by=lisarinna&hl=en>
https://www.instagram.com/p/BTsWPwvh_VF/?taken-by=lisarinna

40.Akon:

<https://www.instagram.com/p/BUJY57IF8dL/?hl=en&taken-by=akon>
<https://www.instagram.com/p/BUNnvq4FheK/?hl=en&taken-by=akon>
<https://www.instagram.com/p/BUSV3m6lSVC/?taken-by=akon&hl=en>
<https://www.instagram.com/p/BUa5x98FYPu/?taken-by=akon&hl=en>

41.Jennifer Lopez:

<https://www.instagram.com/p/BTkTW6dlZ0W/?taken-by=jlo&hl=en>
<https://www.instagram.com/p/BTknoNelEPY/?taken-by=jlo&hl=en>

42.Vanessa Lachey:

https://www.instagram.com/p/BT6uXNUAa_e/?taken-by=vanessalachey&hl=en

43.Victoria Beckham:

<https://www.instagram.com/p/BTwvuYahCL8/?taken-by=victoriabeckham&hl=en>

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² Federal Trade Commission. (2017). FTC Staff Reminds Influencers and Brands to Clearly Disclose Relationship. Retrieved from <https://www.ftc.gov/news-events/press-releases/2017/04/ftc-staff-reminds-influencers-brands-clearly-disclose>

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⁴ Federal Trade Commission. (2017). FTC Staff Reminds Influencers and Brands to Clearly Disclose Relationship. Retrieved from <https://www.ftc.gov/news-events/press-releases/2017/04/ftc-staff-reminds-influencers-brands-clearly-disclose>

⁵ See Appendix A

⁶ [Mediakix Team. \(2017\). 93% of Top Celebrity Social Media Endorsements Violate FTC Guidelines. Retrieved from http://mediakix.com/2017/05/celebrity-social-media-endorsements-violate-ftc-instagram/#gs.b4vkg1k](http://mediakix.com/2017/05/celebrity-social-media-endorsements-violate-ftc-instagram/#gs.b4vkg1k)

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