September 7, 2016

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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 Ms. Rich and Ms. Engle:

Public Citizen, Campaign for a Commercial-Free Childhood and the Center for Digital Democracy are writing to request that the Federal Trade Commission (FTC) investigate and bring enforcement actions related to the practice of non-disclosed advertising through “influencer” user profiles on Instagram. Based on an investigation conducted by Public Citizen and what is clear to anyone who browses popular Instagram profiles, Instagram has become a platform for disguised advertising directed towards young consumers.

We request that the FTC engage in an affirmative effort to change the culture around paid endorsements on Instagram, and that it act promptly and aggressively. We are pleased that FTC representatives have recently made public statements regarding the importance of endorsement disclosures on Instagram. Now is the time to announce and carry out an aggressive enforcement plan, especially regarding repeat offenders.

A longstanding, core principal of fair advertising law in the United States is that people have a right to know when they are being advertised to. With that knowledge, consumers can hopefully apply the appropriate emotional and intellectual filters to advertisements, discounting puffery and claims of authenticity. By contrast, disguised advertisements are inherently deceptive, because consumers do not know to apply appropriate screens. The issue is acute with disguised ads featuring paid endorsements, where deceived consumers believe admired celebrities are making genuine, self-directed and enthusiastic endorsements of brands, not realizing that those celebrities are instead paid and may not even use the touted brand.
Although FTC policy regarding disguised advertising is well established, and reiterated in recent enforcement guidelines, we are deeply concerned that the agency is failing to keep pace with developments in the social media space. The result is that consumers, especially young consumers, are being deceived on vast scale. Social media norms are evolving so that practices that contravene clear FTC policy are considered by many advertisers and influencers to be routine and non-objectionable. Advertisers often assert that “everyone knows” that paid endorsements are pervasive in social media, though there is no evidence to support this assertion, particularly among young consumers. An important part of an FTC enforcement initiative must be to shift the center-of-gravity on social media so that advertisers take affirmative steps to ensure they comply with FTC rules designed to protect consumers from trickery and deception.

The FTC’s Policy on Endorsements

The Federal Trade Commission (FTC) considers an “endorsement” to occur when an endorser is paid to advocate for a product, such as when a TV host is paid to proclaim that they love Donut King. In the recent past, the FTC has done significant work on regulating “endorsements.” In recent years, the FTC has clarified rules on paid endorsements and native advertisements on the Internet, specifying in its enforcement statement the need for more explicit and simultaneous disclosure of all advertisements. The FTC has expressed concerns about the growing trend of native advertisements on search engines, news websites, and social media, as the advertisements sometimes appear indistinguishable from regular content. The specific recommendations focused on the proximity, placement, prominence, and clarity of meaning of the disclosures. Disclosure language like “Promoted by [X]” and “Sponsored by [X]” is discouraged due to possible ambiguity, with the agency directing the use of words like “Advertisement” or “Ad” instead. While the FTC noted that all parties involved with marketing have the responsibility to follow the rules, they stated that the particular onus of obedience was on the marketers.

The FTC has taken enforcement action against disguised ads in social media. In May of 2015, the FTC approved a final consent order against Lord & Taylor for, among other things, paying 50 models to post a picture of themselves wearing a Lord & Taylor dress on Instagram without disclosure of payment. In the final consent order, the FTC stated that paid endorsers must disclose when they have been paid to endorse. It is important to note that the final consent order did not penalize the individual models, but instead disciplined Lord & Taylor, the marketer. Similarly, in September of 2015, the FTC settled with Machinima, Inc. for failing to disclose that they had paid endorsers to promote the Xbox One system and Xbox One games.

Evidence of Non-Compliance with FTC Policy

Non-disclosed native advertising, or advertisements that appear to be regular content, is no longer a minor and isolated phenomenon. Non-disclosed native advertising has become a burgeoning and immensely profitable industry. Companies pay “influencers,” or social media users with a large following, to post endorsements of their products without disclosure. While there is evidence of the illicit “influencer” market on Twitter and Snapchat, the “influencer” industry on Instagram represents one of the most prominent and ethically egregious violations of FTC policy.
Public Citizen conducted an investigation of the disclosure practices among movie stars, reality TV personalities, famous athletes, fitness gurus, fashion icons and pop musicians. The investigation revealed 113 “influencers” who endorsed a product without disclosure; based on industry norms, our presumption is that all or most of these influencers were compensated for their endorsements. This investigation was by no means exhaustive as the total number of illicit endorsements would likely be too high to measure manually. Many of the celebrities cited in the investigation are role models for children and teens. From Rihanna (pop music star) advertising Puma to Kim Kardashian (famous for the teen reality show Keeping Up with the Kardashians) endorsing Express Smile (a teeth-whitening company), these idols have a primarily young and impressionable audience. Other celebrities who have endorsed products without disclosure include musicians in the pop band One Direction and actresses from Nickelodeon shows (e.g. Victoria Justice).

The noncompliant “influencers” mentioned above are not outliers. They represent a growing trend of deceptive native advertising that disproportionately targets young people. “Influencers” almost always are role models that young people tend to emulate in personal tastes, behavior, and purchasing decisions. As a result of the lack of enforcement of FTC policy, millions of consumers, many of whom are minors, are unknowingly being influenced by corporations through the ostensibly benign medium of their own role models.

The cosmetics and weight loss industries are prominent employers of influencers, marketing products ranging from skin cream to teeth whitening kits to herbal teas promising weight loss. The “influencers” in this case are overwhelmingly reality TV stars idolized by young girls and teens, a demographic especially susceptible to advertising preying off of unrealistic standards of beauty. Weight loss companies such as Fab Fit Fun and Flat Tummy Tea appear to employ dozens of celebrities and influencers to endorse their goods without any disclosure.

This problem has reached epidemic proportions. One agent who casts influencers estimates that there are 100,000 Instagram “influencers” paid to endorse, a vast majority of who do not disclose their advertisements.

**Requested Action**

We request that the FTC investigate the serial non-compliance with FTC’s endorsement policy among Instagram “influencers” and hold those who violate FTC policy accountable.

The FTC should communicate with parties that coordinate paid endorsements on Instagram (e.g. companies marketing products, marketing agencies, and self-regulatory advertising organizations) to alert those involved of their violations of FTC policy and require them to ensure that their paid influencers label endorsements correctly. As demonstrated in an accidental leak by reality TV star Scott Disick, endorsement instructions from marketers often do not come with any instructions for disclosure. There must be a major effort undertaken to deliver the message that while hidden endorsements may be rampant, they are illegal and will no longer be tolerated.

The FTC should also take aggressive enforcement action against companies and agencies that engage in the practice of non-disclosed “influencer” endorsements. Based on our investigation, the FTC
should direct its investigative resources at Flat Tummy Tea, owned by Synergy CHC Corp, and L'Oreal USA, and bring enforcement action if they are found to be in serial violation of FTC rules, as well as at the multitude of other cosmetics and weight loss companies engaged in similar practices.

While we believe the emphasis of FTC enforcement activity should be directed against advertisers, the agency should also communicate with prominent influencers, especially the highest compensated among them, and warn them that they too will be subject to enforcement action for future non-compliance with FTC rules.

The very viability of FTC fair advertising rules are at stake. Consumer deception through hidden advertisements is now pervasive in social media, particularly on Instagram. It's past time for the FTC to bring the industry into compliance with the law.

We would be pleased to meet at your earliest convenience to discuss these matters.

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

4. Ibid.
5. Ibid.
7. Ibid.
8. Ibid.
11. See Appendix A for examples.
12. Please consult above list for specific endorsements.
14. See Appendix B for screenshots of Fab Fit Fun and Flat Tummy Tea Instagram posts. The pictures were obtained from a search of the respective companies’ Instagram profile “hashtag” mentions. A majority of the Instagram posts shown in the screenshots display celebrities illicitly endorsing their products. See also Brown, K. Here’s how much celebrities make in the Instagram product placement machine. Retrieved from http://jezebel.com/heres-how-much-celebrities-make-in-the-instagram-product-placement-machine-1740632946.
16. Ibid.
Appendix A

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1: Fashion
1. Endorser: Farrah Abraham  Brand: Teespring
Source: https://www.instagram.com/p/B1mNQ9h15d/?taken-by=farrah__abraham&hl=en

2. Endorser: Scott Disick  Brand: Lord Time Pieces
Source: https://instagram.com/p/BliDwhkgxrY/
3. **Endorser: Zendaya**  
**Brand: Puma**

Source: [https://www.instagram.com/p/BEKSRTPpmOP/?taken-by=zendaya&hl=en](https://www.instagram.com/p/BEKSRTPpmOP/?taken-by=zendaya&hl=en)

4. **Endorser: Julie Bowen**  
**Brand: Ralph Lauren**

Source: [https://www.instagram.com/p/BDD2YmRJvrn/?taken-by=itsjuliebowen&hl=en](https://www.instagram.com/p/BDD2YmRJvrn/?taken-by=itsjuliebowen&hl=en)
5. **Endorser:** Ciara
**Brand:** Buscemi
**Source:** [https://instagram.com/p/BHdLktxjCG2/](https://instagram.com/p/BHdLktxjCG2/)

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6. **Endorser:** Lucy Hale
**Brand:** Chiara Ferragni Collection
**Source:** [https://www.instagram.com/p/BFXawC1QuY/?taken-by=lucyhale&hl=en](https://www.instagram.com/p/BFXawC1QuY/?taken-by=lucyhale&hl=en)
7. **Endorser**: Ashley Benson  
**Brand**: Perverse Sunglasses  
**Source**: [https://www.instagram.com/p/BET-AqTBEF/?taken-by=itsashbenzo&hl=en](https://www.instagram.com/p/BET-AqTBEF/?taken-by=itsashbenzo&hl=en)

![Instagram Post](https://www.instagram.com/p/BET-AqTBEF/?taken-by=itsashbenzo&hl=en)

8. **Endorser**: Bella Thorne  
**Brand**: Puma  
**Source**: [https://www.instagram.com/p/BGCvMiaHTVL/?taken-by=bellathorne&hl=en](https://www.instagram.com/p/BGCvMiaHTVL/?taken-by=bellathorne&hl=en)

![Instagram Post](https://www.instagram.com/p/BGCvMiaHTVL/?taken-by=bellathorne&hl=en)
9. **Endorser:** Dorothy Wang  **Brand:** Buscemi  
**Source:** [https://www.instagram.com/p/BEEvytUTNP6/?taken-by=dorothywang&hl=en](https://www.instagram.com/p/BEEvytUTNP6/?taken-by=dorothywang&hl=en)

10. **Endorser:** Bella Hadid  **Brand:** Givenchy  
**Source:** [https://www.instagram.com/p/BGAT3G2kNoq/?taken-by=bellahadid&hl=en](https://www.instagram.com/p/BGAT3G2kNoq/?taken-by=bellahadid&hl=en)
11. **Endorser:** Jen Selter  | **Brand:** Adidas  
**Source:** [https://www.instagram.com/p/BEhbOmKmkUR/?taken-by=jenselter&hl=en](https://www.instagram.com/p/BEhbOmKmkUR/?taken-by=jenselter&hl=en)

12. **Endorser:** Lindsay Lohan  | **Brand:** Temperley London  
**Source:** [https://www.instagram.com/p/BFo5JWJc1w/?taken-by=lindsaylohan&hl=en](https://www.instagram.com/p/BFo5JWJc1w/?taken-by=lindsaylohan&hl=en)
13. **Endorser:** Troian Bellisario  
**Brand:** Matisse Footwear and Understated Leather  
**Source:** [https://www.instagram.com/p/BGSR1pCGt2p/?taken-by=sleepinthegarden&hl=en](https://www.instagram.com/p/BGSR1pCGt2p/?taken-by=sleepinthegarden&hl=en)

![Instagram Post](https://www.instagram.com/p/BGSR1pCGt2p/?taken-by=sleepinthegarden&hl=en)

14. **Endorser:** Sofia Vergara  
**Brand:** Dana Rebecca Designs  
**Source:** [https://www.instagram.com/p/BBqht3PrpVT/?taken-by=sofiavergara&hl=en](https://www.instagram.com/p/BBqht3PrpVT/?taken-by=sofiavergara&hl=en)

![Instagram Post](https://www.instagram.com/p/BBqht3PrpVT/?taken-by=sofiavergara&hl=en)
15. **Endorser**: Dwight Howard  
**Brand**: Pure Atlanta  
**Source**: [https://www.instagram.com/p/BFXEVnqij4u/?taken-by=dwighthoward&hl=en](https://www.instagram.com/p/BFXEVnqij4u/?taken-by=dwighthoward&hl=en)

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16. **Endorser**: Amber Rose  
**Brand**: Fred and Far  
**Source**: [https://www.instagram.com/p/BGMrDdykq3R/?taken-by=amberrose&hl=en](https://www.instagram.com/p/BGMrDdykq3R/?taken-by=amberrose&hl=en)
17. Endorser: Rihanna  
Brand: Puma  
Source: https://www.instagram.com/p/BF34mXWBM8Q/?taken-by=badgalriri

18. Endorser: Rita Ora  
Brand: Adidas  
Source: https://www.instagram.com/p/BD166lkxs1P/?taken-by=ritaora
2: Beauty Products
19. Endorser: Isabel Sanz  
Brand: NYX Cosmetics  
Source: https://www.instagram.com/p/BJQORirD_KO/?taken-by=isabel_sanzz

20. Endorser: Kylie Jenner  
Brand: Sinful Colors  
Source: https://instagram.com/p/BJZKzWXBL5k/
21. **Endorser:** Scott Disick  
**Brand:** Pearly Whites Australia  
**Source:** [https://instagram.com/p/BHVfX0h0kG/](https://instagram.com/p/BHVfX0h0kG/)

22. **Endorser:** Meghan King Edmonds  
**Brand:** FabFitFun  
**Source:** [https://www.instagram.com/p/BIF-ZMIjzpW/?taken-by=meghankedmonds](https://www.instagram.com/p/BIF-ZMIjzpW/?taken-by=meghankedmonds)
23. **Endorser:** Maci Bookout  
**Brand:** FabFitFun  
**Source:** [https://www.instagram.com/p/BHxhS2SBZSC/?taken-by=macideshanebookout](https://www.instagram.com/p/BHxhS2SBZSC/?taken-by=macideshanebookout)

24. **Endorser:** Marina Ruy Barbosa  
**Brand:** Pantene Brasil  
**Source:** [https://www.instagram.com/p/BGC_T6KHn6c/?taken-by=marinaruybarbosa](https://www.instagram.com/p/BGC_T6KHn6c/?taken-by=marinaruybarbosa)
25. **Endorser:** Lisa Rinna  
**Brand:** ToGoSpa  
**Source:** [https://www.instagram.com/p/B1AtYpqDZaG/?taken-by=lisarinna](https://www.instagram.com/p/B1AtYpqDZaG/?taken-by=lisarinna)

26. **Endorser:** Ashley Tisdale  
**Brand:** Laque Nail Bar  
**Source:** [https://instagram.com/p/B1v70EAgypw/](https://instagram.com/p/B1v70EAgypw/)
27. **Endorser:** Anna Petrosian  
**Brand:** Kat Von D Beauty  
**Source:** [https://instagram.com/p/BllcL8VjJ1O/](https://instagram.com/p/BllcL8VjJ1O/)

28. **Endorser:** Maisie Williams  
**Brand:** Olive and June  
**Source:** [https://www.instagram.com/p/BECCMZmnqhK/?taken-by=maisie_williams](https://www.instagram.com/p/BECCMZmnqhK/?taken-by=maisie_williams)
29. **Endorser:** Kristin Cavallari  
**Brand:** Lorac, Chanel  
**Source:** https://www.instagram.com/p/BGPePnNO6i/?taken-by=kristincavallari

30. **Endorser:** Jade Marie  
**Brand:** L’Oreal  
**Source:** https://instagram.com/p/BJTPxPtk4s/
31. **Endorser:** Ian Somerhalder  
**Brand:** Azzaro Pour Homme  
**Source:** [https://www.instagram.com/p/BABLvYHKJxX/?taken-by=iansomerhalder](https://www.instagram.com/p/BABLvYHKJxX/?taken-by=iansomerhalder)

32. **Endorser:** Blake Lively  
**Brand:** L’Oreal  
**Source:** [https://www.instagram.com/p/BFhQ1j0R4Bo/?taken-by=blakelively](https://www.instagram.com/p/BFhQ1j0R4Bo/?taken-by=blakelively)
33. **Endorser:** Victoria Beckham  
**Brand:** Lancer Skincare  
**Source:** [https://www.instagram.com/p/BEHnSwdliPt/?taken-by=victoriabeckham](https://www.instagram.com/p/BEHnSwdliPt/?taken-by=victoriabeckham)

![Instagram post](https://www.instagram.com/p/BEHnSwdliPt/?taken-by=victoriabeckham)

34. **Endorser:** Victoria Justice  
**Brand:** Simple Skincare  
**Source:** [https://www.instagram.com/p/BFAaZjnlMI/?taken-by=victoriajustice](https://www.instagram.com/p/BFAaZjnlMI/?taken-by=victoriajustice)

![Instagram post](https://www.instagram.com/p/BFAaZjnlMI/?taken-by=victoriajustice)
35. **Endorser:** Rach Parcell  
**Brand:** eos Products  
**Source:** [https://www.instagram.com/p/BGMn94-mx2v/?taken-by=rachparcell](https://www.instagram.com/p/BGMn94-mx2v/?taken-by=rachparcell)

36. **Endorser:** Emily Ratajkowski  
**Brand:** Nip + Fab  
**Source:** [https://www.instagram.com/p/BGR7_3XS2XX/?taken-by=emrata](https://www.instagram.com/p/BGR7_3XS2XX/?taken-by=emrata)
37. **Endorser:** Behati Prinsloo
**Levine**
**Brand:** Josie Maran Cosmetics
**Source:** [https://www.instagram.com/p/BBWPMCTwIp/?taken-by=behatiprinsloo](https://www.instagram.com/p/BBWPMCTwIp/?taken-by=behatiprinsloo)

38. **Endorser:** Vanessa Lachey
**Brand:** Yves Saint Laurent Beauty
**Source:** [https://www.instagram.com/p/BDLdv5BNyP7/?taken-by=vanessalachey](https://www.instagram.com/p/BDLdv5BNyP7/?taken-by=vanessalachey)
39. **Endorser:** Liza Lash  **Brand:** L’Oreal  
**Source:** [https://www.instagram.com/p/Blh-rYA62I/?tagged=lorealleaguead](https://www.instagram.com/p/Blh-rYA62I/?tagged=lorealleaguead)

![Image of Liza Lash with L’Oreal Products]

Liza Lash had some fun with her L’Oreal makeup this morning and made this design based on her face contours. 🌟

40. **Endorser:** Vanessa Hudgens  **Brand:** Illuminate Cosmetics  
**Source:** [https://www.instagram.com/p/BGlpHP1zCs8/?taken-by=vanessahudgens](https://www.instagram.com/p/BGlpHP1zCs8/?taken-by=vanessahudgens)

![Image of Vanessa Hudgens with Illuminate Cosmetics Products]

Vanessa Hudgens is so proud of her Illuminate Cosmetics for launching. 😊

@Illuminatethekollection Luv it so much. Check it out! #IlluminateCosmetics #IlluminateByAshley #IlluminateCosmeticCollection #TheKollection

Add a comment...
41. Endorser: Chelsea Houska  
**Brand:** SugarBearHair  
**Source:** [https://www.instagram.com/p/BGsiAmDnaw5/?taken-by=chelseahouska](https://www.instagram.com/p/BGsiAmDnaw5/?taken-by=chelseahouska)

Chelsea Houska shares her excitement about SugarBearHair and its vitamins, stating they are great for her hair. She expresses surprise when a troll comments negatively, suggesting the troll is a fake profile. Chelsea responds with humor and professionalism, maintaining her positive image.

42. Endorser: Eva Mendes  
**Brand:** Circa Beauty  
**Source:** [https://www.instagram.com/p/BFzMcFBJoX/?taken-by=evamendes](https://www.instagram.com/p/BFzMcFBJoX/?taken-by=evamendes)

Eva Mendes discusses her love for Circa Beauty’s color-changing makeup, sharing her opinion on the use of animals in testing. She highlights the beauty of the colors and the transformative effect they have on her look.
43. Endorser: Massy Arias  
Brand: SheaMoisture  
Source: https://www.instagram.com/p/BGV1yUmqrqAA/?taken-by=massy.arias

Massy Arias: My skin care and “I need a slick pony tail after this crazy leg day” hair trick. SheaMoisture’s African Black soap & Mud mask, Coconut oil, and Jamaican black castor oil styling lotion. If you queens haven’t heard of African black soap, then it is time you do. If you sweat as much as I do on a regular basis and tend to break out, or just you have acneblemish prone skin, this soap and mask are bomb.com (same mask I had on Saturday on Snapchat; Massy). I use coconut oil to moisturize my skin, to wipe off any makeup, and to hydrate/ moisturize my hair and edges. The Jamaican black castor oil lotion is what I use for the slick pony tail I did on Snapchat today.

Tip: I use the soap for both body and face. Immediately post workout. The mask I use it once a week. I apply the

44. Endorser: Danielle Peazer  
Brand: L’Oreal  
Source: https://www.instagram.com/p/BJV7_P7Abq_/?tagged=lorealparis

Danielle Peazer Saturday’s party face 😎 lol just I’m sat at home on my sofa because I had a late night last night 😌

#daniellepeazer #makeup #lorealpars #lorealparis #beauty #lips #mua #lips #lips #mua #lorealpars #makeupartist #lorealpars #lorealparis #beauty #lips #mua #lips #lips #mua #lorealpars #makeupartist #lorealpars #lorealparis
45. **Endorser:** Amanda Bisk  
**Brand:** Biotherm  
**Source:** [https://www.instagram.com/p/BGEilzUGlxW/?taken-by=amandabisk](https://www.instagram.com/p/BGEilzUGlxW/?taken-by=amandabisk)

Amanda Bisk: This is my skin ritual! 😍

I've had lots of questions recently about my skin so I thought I'd let you guys know one of the biggest things that has changed in my skin care routine in the last 6 months...  
My entire life I have struggled with dry and sensitive skin (especially on my face) 😜 and also bad eczema. If any of you have similar skin, I'm sure you have tried like a billion creams, ointments, moisturisers, and pretty much everything like me! 😅

Life Planctom is now the base of my skin routine (I put on after cleansing and before my moisturiser and I also put it on any eczema breakouts). It's basically a concentrated micro-organism essence that regenerates the skin (I'll let you read more on their page if you want lol @biotherm 🌐)

To sum up what I think as simply as...

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46. **Endorser:** Lilly Ghalichi  
**Brand:** HAIRtamin  
**Source:** [https://www.instagram.com/p/BIX_wkyjNHU/?taken-by=lillyghalichi&hl=en](https://www.instagram.com/p/BIX_wkyjNHU/?taken-by=lillyghalichi&hl=en)

Lilly Ghalichi: Omg that HAIR! @HAIRtamin Hair Nourishing Vitamins have helped me so much and I can't wait to get results like the beautiful GLAMTwins @klaudiafisue @klaudiafisue have from taking them! #GhalsGlam #HAIRtamin

seashore20: I've just started using them 😍

@ma_haminisays: 😍

@for_beauty: 😍

@makeup_addict: 😍

@fashion24: 😍

ctx: I can feel my hair getting thicker after 3 months usage. I lost a lot...

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47. **Endorser:** Stephanie Pratt  **Brand:** MatrixUK
**Source:** https://www.instagram.com/p/B163EM8gNil/?taken-by=officialstephpratt

3: **Fitness**
48. **Endorser:** Victoria Azarenka  **Brand:** Nike
**Source:** https://www.instagram.com/p/BC57RymDLY/?taken-by=vichka35
49. **Endorser:** Michael Phelps  
**Brand:** Under Armour  
**Source:** [https://www.instagram.com/p/BC0QPjGSx-G/?taken-by=m Phelps00](https://www.instagram.com/p/BC0QPjGSx-G/?taken-by=m Phelps00)

50. **Endorser:** David Beckham  
**Brand:** Adidas  
**Source:** [https://www.instagram.com/p/BE1BfZZzWdo/?taken-by=davidbeckham](https://www.instagram.com/p/BE1BfZZzWdo/?taken-by=davidbeckham)
51. **Endorser:** Pharrell Williams  
**Brand:** Adidas  
**Source:** [https://www.instagram.com/p/BC7v4ZsEW9d/?taken-by=pharrell](https://www.instagram.com/p/BC7v4ZsEW9d/?taken-by=pharrell)

52. **Endorser:** Serena Williams  
**Brand:** Nike  
**Source:** [https://www.instagram.com/p/BFWbtJasTOz/?taken-by=serenawilliams](https://www.instagram.com/p/BFWbtJasTOz/?taken-by=serenawilliams)
53. **Endorser:** Michelle Wie  
**Brand:** Nike  
**Source:** [https://www.instagram.com/p/BFbtkYip-iD/?taken-by=themichellewie](https://www.instagram.com/p/BFbtkYip-iD/?taken-by=themichellewie)

54. **Endorser:** Sydney Leroux Dwyer  
**Brand:** Nike  
**Source:** [https://www.instagram.com/p/BFE5KsDGWEt/?taken-by=sydneyleroux](https://www.instagram.com/p/BFE5KsDGWEt/?taken-by=sydneyleroux)
55. **Endorser:** Gareth Bale  **Brand:** Foot Locker Europe  
**Source:** [https://www.instagram.com/p/BGEpyb1RPEH/?taken-by=garethbale11](https://www.instagram.com/p/BGEpyb1RPEH/?taken-by=garethbale11)

56. **Endorser:** Stephen Curry  **Brand:** Coach Up  
**Source:** [https://www.instagram.com/p/BDH4QHzfx/?taken-by=stephencurry30](https://www.instagram.com/p/BDH4QHzfx/?taken-by=stephencurry30)
57. **Endorser:** Drake  
**Brand:** October’s Very Own (OVO)  
**Source:** [https://www.instagram.com/p/BGaqWFCDQ1R/?taken-by=champagnepapi](https://www.instagram.com/p/BGaqWFCDQ1R/?taken-by=champagnepapi)

58. **Endorser:** Luis Suarez  
**Brand:** Adidas  
**Source:** [https://www.instagram.com/p/BDj5HmBQpHs/?taken-by=luissuarez9](https://www.instagram.com/p/BDj5HmBQpHs/?taken-by=luissuarez9)
59. Endorser: Nicky Jam  
Brand: Adidas  
Source: https://www.instagram.com/p/BF5FpCTdZ/?taken-by=nickyjampr

60. Endorser: Mark Wahlberg  
Brand: Nike  
Source: https://www.instagram.com/p/BF2pDqEmKnW/?taken-by=markwahlberg
61. **Endorser:** Luke Bryan  
**Brand:** Cabela's  
**Source:** [https://www.instagram.com/p/BFe3vD0LsKO/?taken-by=lukebryan](https://www.instagram.com/p/BFe3vD0LsKO/?taken-by=lukebryan)

Luke Bryan

Which one should I get? #HFE

View all 10,077 comments

hannahwilson: How am I your biggest fan ever?

taylormitchell101: Too many to choose from...

madmax: I love youuuuu,

colepeterson07: All of them! @lukebryan

blake2012: I would like to meet you in real life. They're all beautiful works of art! But Luke, you should only get the one with a grip that feels like hand in glove. Has just enough play to it, and can cast off as easily as you need it to. Just make sure if you're using a lure... Better make it a better one than you might've usually been using... Better on a than you might've usually been using...

coby29: @lukebryan


62. **Endorser:** Marcelo Brand  
**Brand:** Adidas  
**Source:** [https://www.instagram.com/p/BGCgwyEKfEA/?taken-by=marcelotwelve](https://www.instagram.com/p/BGCgwyEKfEA/?taken-by=marcelotwelve)

Marcelo twelve

Nothing beats the feeling of being first and I want to share this feeling with you. Go to my Facebook page NOW to win a @abstractfootball merchandise and adidasfootball FK16 boots!

No hay nada mejor que la sensación de ser el primero y querer compartir este sentimiento con vosotros. Ve a mi Facebook ANDORA para ganar la medalla @abstractfootball y botas adidasfootball FK16. No hay nada mejor que la sensación de ser el primero y querer compartir este sentimiento con vosotros. Ve a mi Facebook ANDORA para ganar la medalla @abstractfootball y botas adidasfootball FK16.
63. **Endorser:** Rickie Fowler  
**Brand:** Puma  
**Source:** [https://www.instagram.com/p/BEOiBgTQU-/?taken-by=rickiefowler](https://www.instagram.com/p/BEOiBgTQU-/?taken-by=rickiefowler)

64. **Endorser:** Niall Horan  
**Brand:** Nike  
**Source:** [https://www.instagram.com/p/BFzgM1EmYoz/?taken-by=niallhoran](https://www.instagram.com/p/BFzgM1EmYoz/?taken-by=niallhoran)
65. **Endorser:** Kris Jenner  
**Brand:** Arthur George  
**Source:** [https://www.instagram.com/p/BGXSqGWG-LG/?taken-by=krisjenner](https://www.instagram.com/p/BGXSqGWG-LG/?taken-by=krisjenner)

66. **Endorser:** Nina Agdal  
**Brand:** Soul Cycle  
**Source:** [https://www.instagram.com/p/BGCNA8vu2p5/?taken-by=ninaagdal](https://www.instagram.com/p/BGCNA8vu2p5/?taken-by=ninaagdal)
67. **Endorser:** Floyd Mayweather  
**Brand:** SubZero Recovery  
**Source:** [https://www.instagram.com/p/BGYrUx3ep/?taken-by=floydmayweather](https://www.instagram.com/p/BGYrUx3ep/?taken-by=floydmayweather)

68. **Endorser:** Brad Richards  
**Brand:** Bridgestone Sports  
**Source:** [https://www.instagram.com/p/BE613yEse1/?taken-by=brichards_1991](https://www.instagram.com/p/BE613yEse1/?taken-by=brichards_1991)
4 Food and Beverage
69. Endorser: Porsha Dyanne Williams Brand: Flat Tummy Tea
Source: https://www.instagram.com/p/BIH2Q6tgWk3/?taken-by=porsha4real

70. Endorser: Lindsay Lohan Brand: Pinnertest
Source: https://www.instagram.com/p/BDJ2XIDjycn/
71. Endorser: Jenny McCarthy
Brand: CD Vodka
Source: https://www.instagram.com/p/BHLVzdAdP7_/?taken-by=jennymccarthy

72. Endorser: Zlatan Ibrahimovic
Brand: Vitamin Well
Source: https://www.instagram.com/p/BEDQBFwM00e/?taken-by=iamzlatanibrahimovic
73. **Endorser:** Sophia Bush  
**Brand:** Sakara  
**Source:** [https://www.instagram.com/sakaralife/](https://www.instagram.com/sakaralife/)

Sophia Bush is promoting Sakara Life's plant-based diet plan and products. In her post, she shares her thoughts on sharing her personal lifestyle choices and encourages others to embrace their own paths. She mentions loving living this way of eating and exercising and helps her friends feel better and healthier. Sophia Bush shares her diet plan to inspire others to make healthy choices and live their best lives. She also promotes Sakara Life's products, which can be found at [https://www.instagram.com/sakaralife/](https://www.instagram.com/sakaralife/).

74. **Endorser:** Nicole "Snooki" Polizzi  
**Brand:** Flat Tummy Tea  
**Source:** [https://www.instagram.com/p/BGajsY8BjrJ/?taken-by=snookinic](https://www.instagram.com/p/BGajsY8BjrJ/?taken-by=snookinic)

Nicole "Snooki" Polizzi is promoting Flat Tummy Tea's summer sale and sharing her thoughts on flat tummy teas. She mentions that she's doing summer without a flat tummy and shares that Flat Tummy Tea has a 20% sale going on. She encourages her followers to take advantage of the sale and share their thoughts on the tea's effectiveness. Snooki's post can be found on her Instagram account at [https://www.instagram.com/p/BGajsY8BjrJ/?taken-by=snookinic](https://www.instagram.com/p/BGajsY8BjrJ/?taken-by=snookinic).
75. Endorser: Shay Mitchell  
Brand: Nettle Brand  
Source: [https://www.instagram.com/p/BGPSuKFQr6F/?taken-by=shaym](https://www.instagram.com/p/BGPSuKFQr6F/?taken-by=shaym)

76. Endorser: Sean Combs  
Brand: Aqua Hydrate  
Source: [https://www.instagram.com/p/BGaNr4plwG/?taken-by=iamdiddy](https://www.instagram.com/p/BGaNr4plwG/?taken-by=iamdiddy)
77. **Endorser:** Scott Eastwood  
**Brand:** Anheuser Busch  
**Source:** [https://www.instagram.com/p/BDgXBEhEsqP/?taken-by=scotteastwood](https://www.instagram.com/p/BDgXBEhEsqP/?taken-by=scotteastwood)

78. **Endorser:** Nick Lachey  
**Brand:** Anheuser Busch  
**Source:** [https://www.instagram.com/p/5mbE7C3Oj/?taken-by=nicklachey](https://www.instagram.com/p/5mbE7C3Oj/?taken-by=nicklachey)
79. **Endorser:** Naomi Campbell  
**Brand:** Clean Program  
**Source:** https://www.instagram.com/p/BF6d0zOo5lm/?taken-by=iamnaomicampbell

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80. **Endorser:** Meek Mill  
**Brand:** Luc Belaire Winery  
**Source:** https://www.instagram.com/p/BF9jAcikJ6/?taken-by=meekmill
81. Endorser: Louis Tomlinson  
**Brand:** Red Bull  
**Source:** [https://www.instagram.com/p/BF_ZUZl4Rg/?taken-by=louist91](https://www.instagram.com/p/BF_ZUZl4Rg/?taken-by=louist91)  

![Instagram post by louist91](image1)

82. Endorser: Lebron James  
**Brand:** Blaze Pizza  
**Source:** [https://www.instagram.com/p/BDtX6H9iTMX/?taken-by=kingjames](https://www.instagram.com/p/BDtX6H9iTMX/?taken-by=kingjames)  

![Instagram post by kingjames](image2)
83. **Endorser:** Kourtney Kardashian **Brand:** Popeyes  
**Source:** [https://www.instagram.com/p/BFePAxElqY/?taken-by=kourtneykardash](https://www.instagram.com/p/BFePAxElqY/?taken-by=kourtneykardash)

84. **Endorser:** Khloe Kardashian **Brand:** Fit Tea  
**Source:** [https://www.instagram.com/p/BFjmYrfrRt4/?taken-by=khloekardashian](https://www.instagram.com/p/BFjmYrfrRt4/?taken-by=khloekardashian)
85. **Endorser:** Kevin Durant  
**Brand:** Sparkling Ice  
**Source:** [https://www.instagram.com/p/_R1mBZzSk8/?taken-by=easymoneysniper](https://www.instagram.com/p/_R1mBZzSk8/?taken-by=easymoneysniper)

86. **Endorser:** Kendall Jenner  
**Brand:** Magnum  
**Source:** [https://www.instagram.com/p/BFTXyc0Do14/?taken-by=kendalljenner](https://www.instagram.com/p/BFTXyc0Do14/?taken-by=kendalljenner)
87. **Endorser:** Jay Alvarrez  
**Brand:** Haleiwa Bowls  
**Source:** [https://www.instagram.com/p/BGl34uhMm_w/?taken-by=jayalvarrez](https://www.instagram.com/p/BGl34uhMm_w/?taken-by=jayalvarrez)

88. **Endorser:** James Harrison  
**Brand:** Optimum EFX  
**Source:** [https://www.instagram.com/p/BGac5TpJFjb/?taken-by=jharrison92](https://www.instagram.com/p/BGac5TpJFjb/?taken-by=jharrison92)
89. **Endorser:** Heidi Klum  
**Brand:** Dunkin' Donuts  
**Source:** [https://www.instagram.com/p/BExH1NZD1dW/?taken-by=heidiklum](https://www.instagram.com/p/BExH1NZD1dW/?taken-by=heidiklum)

90. **Endorser:** Gabrielle Union  
**Brand:** Moët  
**Source:** [https://www.instagram.com/p/BDtJXyvJ-Ts/?taken-by=gabunion](https://www.instagram.com/p/BDtJXyvJ-Ts/?taken-by=gabunion)
91. **Endorser:** Chris Pratt  
**Brand:** Caveman Coffee  
**Source:** [https://www.instagram.com/p/vi4E6b-jHEX/?taken-by=prattprattpratt](https://www.instagram.com/p/vi4E6b-jHEX/?taken-by=prattprattpratt)

92. **Endorser:** Caroline Manzo  
**Brand:** HelloFresh US  
**Source:** [https://www.instagram.com/p/BIDweZ1gN8X/?taken-by=carolinemanzo](https://www.instagram.com/p/BIDweZ1gN8X/?taken-by=carolinemanzo)
93. **Endorser:** Brody Jenner  
**Brand:** Lay's  
**Source:** [https://www.instagram.com/p/BFm3pkpsIBg/?taken-by=brodyjenner](https://www.instagram.com/p/BFm3pkpsIBg/?taken-by=brodyjenner)

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94. **Endorser:** Anne Hathaway  
**Brand:** Kreation Organic  
**Source:** [https://www.instagram.com/p/BFmzS2ll0li/?taken-by=annehathaway](https://www.instagram.com/p/BFmzS2ll0li/?taken-by=annehathaway)
95. **Endorser:** Akon  
**Brand:** Vodka Beluga  
**Source:** [https://www.instagram.com/p/BEwy4kDFsD0/?taken-by=akon](https://www.instagram.com/p/BEwy4kDFsD0/?taken-by=akon)

96. **Endorser:** 50 Cent  
**Brand:** Effen Vodka  
**Source:** [https://www.instagram.com/p/BGS8hLML20/?taken-by=50cent](https://www.instagram.com/p/BGS8hLML20/?taken-by=50cent)
5: OTHER

97. Endorser: Scott Disick  
Brand: Lyft  
Source: https://instagram.com/p/BI--VokgXRp/

98. Endorser: Dan Bilzerian  
Brand: Boulder Boats  
Source: https://www.instagram.com/p/BGGE7bfoDnU/?taken-by=danbilzerian
99. **Endorser:** Liam Payne  
**Brand:** Marvel  
**Source:** [https://www.instagram.com/p/sT6Larg1R5/?taken-by=liampayne](https://www.instagram.com/p/sT6Larg1R5/?taken-by=liampayne)

100. **Endorser:** Vanessa Hudgens  
**Brand:** My Little Pony  
**Source:** [https://www.instagram.com/p/BldKwYYhEJL/](https://www.instagram.com/p/BldKwYYhEJL/)
101. **Endorser:** Gigi Hadid  
**Brand:** BMW  
**Source:** [https://www.instagram.com/p/BEL_hoZjCer/?taken-by=giglihadid](https://www.instagram.com/p/BEL_hoZjCer/?taken-by=giglihadid)

102. **Endorser:** Neymar  
**Brand:** Airbnb  
**Source:** [https://www.instagram.com/p/BGNhOXaxttY/?taken-by=neymarjr](https://www.instagram.com/p/BGNhOXaxttY/?taken-by=neymarjr)
103. Endorser: Snoop Dogg  
Brand: Mercedes  
Source: https://www.instagram.com/p/BGSRSNbp9F-/?taken-by=snooppdogg

104. Endorser: Jennifer Lopez  
Brand: The Perfect Match (Movie)  
Source: https://www.instagram.com/p/BC07HGOGuEH/?taken-by=jlo
105. **Endorser:** Giuliana Rancic  
**Brand:** Compeed, Walgreens Boots Alliance  
**Source:** [https://www.instagram.com/p/BGH4uqgwi3Y/?taken-by=giulianaran cic](https://www.instagram.com/p/BGH4uqgwi3Y/?taken-by=giulianaran cic)

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106. **Endorser:** Ciara  
**Brand:** Jeep  
**Source:** [https://www.instagram.com/p/BFClHnUyHiW/?taken-by=ciara](https://www.instagram.com/p/BFClHnUyHiW/?taken-by=ciara)
107. Endorser: Asap Rocky Brand: Mercedes
Source: https://www.instagram.com/p/BFrUTdvha4z/?taken-by=asaprocky

108. Endorser: Missy Elliott Brand: Beats
Source: https://www.instagram.com/p/BAVgOA4lXxX/?taken-by=missymisdemeanorelliott
109. **Endorser:** Dwayne "The Rock" Johnson  
**Brand:** Under Armour  
**Source:** [https://www.instagram.com/p/BFemb4jlH-e/?taken-by=therock](https://www.instagram.com/p/BFemb4jlH-e/?taken-by=therock)

110. **Endorser:** Abby Lee  
**Brand:** The Davenport Grand Hotel  
**Source:** [https://www.instagram.com/p/BGNy88RGuY/?taken-by=therealabbylee](https://www.instagram.com/p/BGNy88RGuY/?taken-by=therealabbylee)
111. Endorser: Irina Shayk  
Brand: Sirin Labs  
Source: https://www.instagram.com/p/BGJ6Biat-Si/?taken-by=irinashayk

112. Endorser: Allen Iverson  
Brand: IO Moonwalkers  
Source: https://www.instagram.com/p/8mlHWjcuw/?taken-by=theofficialai3
113. **Endorser:** Demi Lovato  
**Brand:** Honda  
**Source:** https://www.instagram.com/p/BEZxLLnuKoH/?taken-by=ddlovato
November 30, 2016

Jessica L. Rich
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 Ms. Rich and Ms. Engle:

Undisclosed paid product endorsements continue to persist as a serious problem on Instagram, and the Federal Trade Commission (FTC) has yet to take action to enforce its policy, which states that paid endorsements should be identified with #advertisement or #ad. The letter that we sent to the FTC on September 7, 2016 details the problems surrounding this practice and includes over 100 examples of posts that violate FTC policy. We again request that the FTC engage in an affirmative effort to change the culture around paid endorsements on Instagram, and that it act promptly and aggressively. Enforcement actions should be taken against serial offenders, marketing agencies and endorsers that continue to violate FTC policy.

Please see the attached appendix for a collection of 50 recent examples of undisclosed influencer posts on Instagram. All of these examples were posted during the time period of September 1, 2016 - November 14, 2016. This document does not represent a complete inventory of posts that violate FTC policy on Instagram, and we suspect that there are thousands more not reflected in this document, especially among influencers with small followings.

Recent examples demonstrate that lesser known celebrities and influencers with smaller followings are dominating the influencer market on Instagram. Websites specifically designed to connect brands with average Instagram users for the purpose of advertising products have recently emerged. Websites owned by Influencer and Bzzagent send users free products in exchange for reviews and social media posts. Once a user receives a free sample, they are encouraged to post a photo on Instagram to advertise the product to their friends. The more posts promoting a product that a user makes, the more free products they receive. Although Influencer’s website directs users to use a discloser, our survey suggests that most fail to do so and only tag Influencer and the brand being promoted. Bzzagent does not instruct influencers to use the proper #advertisement or #ad disclosure at all. Instead, it instructs influencers to use #GotItFree or #GotACoupon.

Undisclosed paid endorsements from average consumers represents a dangerous trend that the FTC must address, since people generally place more trust in recommendations made by their
peers and have no reason to believe that their friends, colleagues and family are engaging in paid product promotion. Thus, companies are preying off of the trust and relatability of smaller level influencers. We encourage the FTC to investigate Influunser and Bzzagent’s disclosure policies and communication practices with influencers.

Undisclosed paid product endorsements on Instagram are a consistent and dangerous problem that is not going away. We urge the FTC to act immediately, aggressively and comprehensively to protect consumers from this deceptive advertising practice. We request that the FTC investigate the serial non-compliance with FTC’s endorsement policy among Instagram “influencers” and hold those who violate FTC policy accountable.

We would be pleased to meet with you to discuss these matters.

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
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4 See Appendix B
# Appendix A

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2. Endorser: Lucy Hale  
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3. Endorser: Ryan Reynolds
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4. Endorser: Emily Ratajkowski
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5. **Brand**: LuLa Roe  
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**Followers**: 36.6k  
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6. **Endorser**: Rickie Fowler  
**Brand**: PUMA  
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https://www.instagram.com/p/BKwTQaThw_V/?taken-by=rickiefowler&hl=en
7. Endorser: Kris Jenner
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https://www.instagram.com/p/BMSxVmTA1xY/?taken-by=krisjenner&hl=en

8. Endorser: Heidi Klum
Brand: MCM
Followers: 3.2m
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9. **Endorser:** Demi Lovato  
**Brand:** New York Color Canada  
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https://www.instagram.com/p/BKtSjtkgPgZ/?taken-by=ddlovato&hl=en

10. **Endorser:** Chrissy Teigen  
**Brand:** Lamer  
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https://www.instagram.com/p/BKzNPzygC8n/?taken-by=chrissyteigen
11. Endorser: Amadea Muse
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https://www.instagram.com/p/BMobgNbgb7M/?taken-by=amadea_dashurie

12. Endorser: Valentina Vignal
Brand: Hair Burst
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13. Endorser: Kourtney Kardashian  
Brand: Manuka  
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https://www.instagram.com/p/BMElsADIGfK/?taken-by=kourtneykardash&hl=en

14. Endorser: Nathan Lassyri  
Brand: Amour Noir  
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https://www.instagram.com/p/BMhf4M7DrcF/?taken-by=nathan.lassyri
15. Endorser: Jenni JWOWW  
Brand: FabFitFun  
Followers: 4.7m  
https://www.instagram.com/p/BK8cJ21Yfe/?taken-by=jwoww&hl=en

16. Endorser: Jamie Lynn Spears  
Brand: FabFitFun  
Followers: 1.2m  
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17. Endorser: Kim Zolciak-Biermann
Brand: FabFitFun
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https://www.instagram.com/p/BMR6xu78dzr/?taken-by=kimzolciakbiermann

18. Endorser: Maci Bookout McKinney
Brand: FabFitFun
Followers: 3.3m
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19. Endorser: Ashley Benson  
Brand: Nip and Fab  
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https://www.instagram.com/p/BLwC3hZho7O/?taken-by=itsashbenzo

20. Endorser: Victoria Beckham  
Brand: Estee Lauder  
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https://www.instagram.com/p/BKWNmLJA5F6/?taken-by=victoriabeckham
21. Endorser: Shay Mitchell  
Brand: Biore  
Followers: 14.3m  
https://www.instagram.com/p/BLZrgpUBp10/?taken-by=shaym&hl=en

22. Endorser: Tiona Fernan  
Brand: FlatTummyTea  
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23. Endorser: Alexis Fawx
Brand: FlatTummyTea
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24. Endorser: Farrah Abraham
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25. Endorser: Sveta Bilyalova
Brand: Fit Tea
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26. Endorser: Maci Bookout McKinney
Brand: FlatBellyTea
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27. Endorser: Stephanie Pratt
Brand: Thermo Thrive.
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28. Endorser: Denice Emoberg
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29. Endorser: Jazmine Garcia  
Brand: EHP Labs  
Followers: 260k  
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30. Endorser: Dickerson Ross  
Brand: EHP Labs  
Followers: 1.4m  
https://www.instagram.com/p/BLyPN-ShbPX/?taken-by=dickersonross
31. Endorser: Ashley Kaltwasser
Brand: EHP Labs
Followers: 615k
https://www.instagram.com/p/BMNacCKD6wv/?taken-by=ashleykfit&hl=en

32. Endorser: James Harrison
Brand: Optimumefx
Followers: 487k
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33. **Endorser:** Giuliana Ava  
**Brand:** Fate Fuel  
**Followers:** 101k  
https://www.instagram.com/p/BMb7UQ8jANT/?taken-by=giulianaavafit

34. **Endorser:** Nina Agdal  
**Brand:** Muscle Milk  
**Followers:** 1.4m  
https://www.instagram.com/p/BLy70TzgDYQ/?taken-by=ninaagdal&hl=en
35. Endorser: Porsha Dyanne Williams
Brand: Colombian Waist
Followers: 2.5m
https://www.instagram.com/p/BLrBclbhSKB/?taken-by=porsha4real&hl=en

36. Endorser: Vanessa Hudgens
Brand: Graze USA
Followers: 21.8m
https://www.instagram.com/p/BKYzTA5BewR/?taken-by=vanessahudgens
37. Endorser: Stephanie Pratt  
Brand: Twisted Halouk  
Followers: 807k  
https://www.instagram.com/p/BLtUWPgAlR4/?taken-by=officialstephpratt&hl=en

38. Endorser: Chelsea Houska  
Brand: Love With Food  
Followers: 3.9m  
https://www.instagram.com/p/BKEyWuDDq0M/?taken-by=chelseahouska
39. Endorser: Michael Phelps  
Brand: Blue Apron  
Followers: 3.1m  
https://www.instagram.com/p/BLNBgK1AE2f/?taken-by=m_phelps00

40. Endorser: Dwight Howard  
Brand: Coca-Cola  
Followers: 1.9m  
https://www.instagram.com/p/BL1CLATBgTi/?taken-by=dwighthoward
41. Endorser: Jennifer Lopez
Brand: Vodkabeluga
Followers: 52.4m
https://www.instagram.com/p/BJ04NxAx-_/taken-by=jlo

42. Endorser: Emily Ratajkowski
Brand: EFFEN Vodka
Followers: 12.3m
https://www.instagram.com/p/BLLtNjugXub/?taken-by=50cent&hl=en
43. Endorser: Caroline Manzo
Brand: Hello Fresh
Followers: 497k
https://www.instagram.com/p/BMCoUnJzPE/?taken-by=carolinemanzo&hl=en

44. Endorser: Puff Daddy
Brand: Ciroc
Followers: 7.2m
https://www.instagram.com/p/BMrttMZATx/?taken-by=iamdiddy
45. Endorser: Jessica Burciaga
Brand: Lyft Vodka
Followers: 1.6m
https://www.instagram.com/p/BLNjlSDBDbh/?taken-by=jessicaburciaga&hl=en

46. Endorser: Scott Disick
Brand: Lyft
Followers: 18.4m
https://www.instagram.com/p/BMpk8aeh5Gz/?taken-by=letthelordbewithyou&hl=en
47. Endorser: Scott Disick
Brand: Lyft
Followers: 18.3m
https://www.instagram.com/p/BK_iGGh3Rx/?taken-by=letthelordbewithyou

48. Endorser: Amber Rose
Brand: Lyft
Followers: 12.6m
https://www.instagram.com/p/BLmJL51DSz/?taken-by=amberrose&hl=en
49. Endorser: Chelsea Houska
Brand: Datebox
Followers: 3.9m
https://www.instagram.com/p/BLzKD8TBK92/?taken-by=chelseahouska

50. Endorser: Irina Shayk
Brand: Sirin Labs
Followers: 6.8m
https://www.instagram.com/p/BKnnCSMh2zy/?taken-by=irinashayk
Appendix B

Endorser: redalicerao
Brand: Make Up For Ever through Influenster
Followers: 18.6k
https://www.instagram.com/p/BMyTH4iBelG/?tagged=influenster&hl=en

Endorser: glowingkite
Brand: Maybelline through Influenster
Followers: 4,186
https://www.instagram.com/p/BMxz45DgAii/?tagged=influenster&hl=en
Endorser: Jensvanity
Brand: Lancome through Influenster
Followers: 191
https://www.instagram.com/p/7MwznPGj8SE/?tagged=influenster&hl=en

Endorser: Ashley Richardson
Brand: Bite Beauty through Influenster
Followers: 671
https://www.instagram.com/p/BMwzWjOGj8SE/?tagged=influenster&hl=en
Endorser: soemmasays
Brand: Nescafe through Bzzagent
Followers: 672
https://www.instagram.com/p/BMzPXsWgOL/?tagged=bzzagent&hl=en

Endorser: soemmasays
Brand: Nescafe through Bzzagent
Followers: 350
https://www.instagram.com/p/BMxiAvhv3Y/?tagged=bzzagent&hl=en