



September 7, 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:

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 statements¹ 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.² 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.³ 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.⁴ 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.⁵

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.⁶ In the final consent order, the FTC stated that paid endorsers must disclose when they have been paid to endorse.⁷ It is important to note that the final consent order did not penalize the individual models, but instead disciplined Lord & Taylor, the marketer.⁸ 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.⁹

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.¹⁰ 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 endorsements¹¹ 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).¹²

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.¹³ 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.¹⁴

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.¹⁵

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.¹⁶ 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

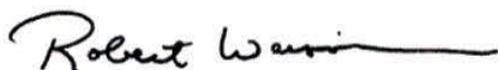
should direct its investigative resources at Flat Tummy Tea, owned by Synergy CHC Corp, and L'Oreal USA, and bring enforcement action if they are found to be in serial violation of FTC rules,¹⁷ as well as at the multitude of other cosmetics and weight loss companies engaged in similar practices.

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,



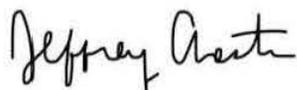
Robert Weissman
President, Public Citizen



Kristen Strader
Campaign Coordinator, Commercial Alert



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



(KS)

Jeffrey Chester
Executive Director, Center for Digital Democracy

Sources

¹ Frier, S. and Townsend, M. (2016). FTC to Crack Down on Paid Celebrity Posts That Aren't Clear Ads. Retrieved from <http://www.bloomberg.com/news/articles/2016-08-05/ftc-to-crack-down-on-paid-celebrity-posts-that-aren-t-clear-ads>.

² Federal Trade Commission. (2009). Guides Concerning the Use of Endorsements and Testimonials in Advertising. Retrieved from <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-publishes-final-guides-governing-endorsements-testimonials/091005revisedendorsementguides.pdf>. Federal Trade Commission. (2015). Commission Enforcement Policy Statement on Deceptively Formatted Advertisements. Retrieved from https://www.ftc.gov/system/files/documents/public_statements/896923/151222deceptiveenforcement.pdf. See also Federal Trade Commission. (2015). The FTC's endorsement guides: What people are asking. Retrieved from https://www.ftc.gov/system/files/documents/public_statements/896923/151222deceptiveenforcement.pdf.

³ Federal Trade Commission. (2015). Native advertising: A guide for businesses. Retrieved from <https://www.ftc.gov/tips-advice/business-center/guidance/native-advertising-guide-businesses>

⁴ Ibid.

⁵ Ibid.

⁶ Federal Trade Commission. (2016). FTC Approves final Lord & Taylor order prohibiting deceptive advertising. Retrieved from <https://www.ftc.gov/news-events/press-releases/2016/05/ftc-approves-final-lord-taylor-order-prohibiting-deceptive>.

⁷ Ibid.

⁸ Ibid.

⁹ Federal Trade Commission. (2015). Xbox One promoter settles FTC charges that it deceived consumers with endorsement videos posted by paid 'influencers.' Retrieved from <https://www.ftc.gov/news-events/press-releases/2015/09/xbox-one-promoter-settles-ftc-charges-it-deceived-consumers>.

¹⁰ Saiidi, U. (2016). The power of Instagram: Brands eye more social media influencers. Retrieved from <http://www.cnbc.com/2016/05/20/the-power-of-instagram-brands-eye-more-social-media-influencers.html>.

¹¹ See Appendix A for examples.

¹² Please consult above list for specific endorsements.

¹³ Renfrew Center Foundation. (2013). From Barbies to Blush – New Survey Reveals Young Girls Are Wearing Makeup Earlier Than Ever to Hide Their Insecurities. Retrieved from <http://www.prnewswire.com/news-releases/from-barbies-to-blush---new-survey-reveals-young-girls-are-wearing-makeup-earlier-than-ever-to-hide-their-insecurities-192318071.html>.

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-produc-1740632946>.

¹⁵ Chafkin, M. (2016). Why Snapchat's influencer economy runs on hot tubs, selfies, and whey protein. Retrieved from <http://www.bloomberg.com/features/2016-arsenictv-snapchat-influencer-economy/>.

¹⁶ Ibid.

Appendix A**Table of Contents**

Fashion	Images 1-18
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Fitness.....	Images 48-68
Food and Beverage	Images 69-96
Other.....	Images 97-113

1: Fashion

1. Endorser: Farrah Abraham Brand: Teespring

Source: https://www.instagram.com/p/BILmNQ9h15d/?taken-by=farrah_abraham&hl=en



2. Endorser: Scott Disick Brand: Lord Time Pieces

Source: <https://instagram.com/p/BiDwhkgxrY/>



3. Endorser: Zendaya Brand: Puma

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



4. Endorser: Julie Bowen Brand: Ralph Lauren

Source: <https://www.instagram.com/p/BDD2YmRJvme/?taken-by=itsjuliebowl&hl=en>



5. Endorser: Ciara Brand: Buscemi

Source: <https://instagram.com/p/BHdLktxjCG2/>



6. Endorser: Lucy Hale Brand: Chiara Ferragni Collection

Source: <https://www.instagram.com/p/BFXawC1Out-/?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>



8. Endorser: Bella Thorne Brand: Puma

Source: <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>



10. Endorser: Bella Hadid Brand: Givenchy

Source: <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>



12. Endorser: Lindsay Lohan Brand: Temperley London

Source: <https://www.instagram.com/p/BFo5JIWJc1w/?taken-by=lindsaylohan&hl=en>



13. Endorser: Troian Bellisario **Brand:** Matisse Footwear and Understated Leather

Source: <https://www.instagram.com/p/BGSR1pCGr2p/?taken-by=sleepinthegardn&hl=en>



sleepinthegardn [Follow](#)

114k likes · 3d

sleepinthegardn My favorite new way to kick the shit out of Sunday. Thank you @understatedleather & @matisse_footwear

View all 129 comments

styleitu.p Fashion fashion <*****

leila_1634 That is cute

abigailtori You inspired me to start aerial yoga/silks thank you I love it ☺ I really admire you for everything & hope life lets you see into its crazy adventures and its memorising moments for many years to come. I think you're deffo NOT an odd one out in PLL everyone is beautiful ✨ hope you're well and keep going T ☺

ravi2157 Nice

kamialmiron Babyyyyyy

elle5297 @kamialmiron fa

♡ Add a comment · ...

14. Endorser: Sofia Vergara **Brand:** Dana Rebecca Designs

Source: <https://www.instagram.com/p/BBqht3PrpVT/?taken-by=sofiavergara&hl=en>



sofiavergara [Follow](#)

75.3k likes · 16w

sofiavergara Wrist full of @danarebecca on set

View all 279 comments

2lovely81 Beautiful

shlaur Ong these are beautiful @natorah @shay_x0x

fiestyrican Beautiful

pimentels @keren2016

nidakharxo @kitchen805

andy20gomez @medicervic soy tan ella

sshru_5 @not_bornonchristmas

negar_64 🤩🤩

aye.teee @ohspericas the one on top looks familiar...minus the diamonds

fatima_bernal @carlosemesto_

carlosemesto_ Están brutales @fatima_bernal

♡ Add a comment · ...

15. Endorser: Dwight Howard Brand: Pure Atlanta

Source: <https://www.instagram.com/p/BFXEVngqi4u/?taken-by=dwighthoward&hl=en>



16. Endorser: Amber Rose Brand: Fred and Far

Source: <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/BD166Ikxs1P/?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



isabel_sanzz
West Hollywood, Cal... [Follow](#)

4,235 likes 7h

isabel_sanzz Ayer en el cocktail de bienvenida de @nyxcosmetics_es @nyxcosmetics disfrutando del ambiente que habia! Qué bien lo pasó! 🥳🥳🥳 #Nyx #nyxcosmetics #nyxcosmetics_es #LA #California #LosAngeles #EEUU

Mono @asos_es #asos Sandalias @primark #primark

view all 51 comments

5_star_woman Party 🥳🥳🥳🥳

nikitriqui Ains!! No te voy a dar ánimos porque no los necesitas! Sigue así, eres una buena niña y todo lo que te va a venir será bonito!! PD: te envidio sanamente!!! 🥳🥳🥳

roclero Eres genial!!! @isabel_sanzz pásalo bien bella!

juliamelcon Me encanta ese mono... Es tan hskavdufv 🥳🥳🥳🥳

♡ Add a comment... 🌐

20. Endorser: Kylie Jenner Brand: SinfulColors

Source: <https://instagram.com/p/BJZKzWXBL5k/>



kyliejenner [Follow](#)

845k likes 1d

kyliejenner My @sinfulcolors_official Collab is almost over, get them while you still can @walmart @walmart full list @sinfulcolors_official

view all 43,854 comments

kledescky Lb

alexmgomez_Lb

unlinstaqueen LB/CB/FB GO FIRST!!!! [sinfulcolors](#)

saucin.png LB

saucin.png LB FAST

conrado_zs_freire First

purplethere BEAUTIFUL AND CHEAP LIPSTICK YOU CAN BUY IN MY PROFILE 🌸🌸

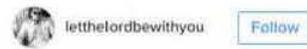
katelyn.whitneyy LB PROMISED EVERYONE PLEASEEE 🌸🌸

alexmgomez_Lb

♡ Add a comment... 🌐

21. Endorser: Scott Disick Brand: Pearly Whites Australia

Source: <https://instagram.com/p/BHVfBX0h0kG/>



118k likes 7w

letthelordbewithyou Getting my teeth 4th of July ready! @pearlywhitesaustralia introduced me to coconut & charcoal infused whitening strips! Check out pearlywhitesaustralia.com #nosensitivity #ad @pearlywhitesaustralia

view all 679 comments

zsofiszeneri @xjoyyx of niet, laat maar

bebyfacee Handsome my husband

saydeekuh Tom cruise

ariannegladu @christina.oz

princessterter Charlie! @alwaysunnyfx

8paau @23lauri

23lauri @8paau

23lauri @8paau

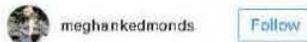
heks1967

szhalkannulu Don'T SMil E ΔGΔIN

Add a comment...

22. Endorser: Meghan King Edmonds Brand: FabFitFun

Source: <https://www.instagram.com/p/BIF-ZMIjzpW/?taken-by=meghankedmonds>



3,329 likes 5d

meghankedmonds On set at my #RHOC interview... Like a kid, I couldn't wait to open my @fabfitfun package! This summer box has been one of the best ones yet! If you want one of your own, use MEGHAN for \$10 off! #FabFitFun #ffipartner

view all 79 comments

kelseyholland @sydcha! she is! I just can't get passed some of the silly cattiness

Add a comment...

23. Endorser: Maci Bookout Brand: FabFitFun

Source: <https://www.instagram.com/p/BHxhS2SBZSC/?taken-by=macideshanebookout>



12.4k likes

3w

macideshanebookout Love that @FabFitFun sends the pampering to me. If you haven't already, subscribe now before this box is gone! Use my code MACI at www.fabfitfun.com for \$10 off. Treat yourself, ladies!! #fabfitfun #FFFFPartner 🙌

view all 41 comments

roxannerespess @elizabethann.wraps

eve_headvsheart @nhodge1976 that company has over 25 accounts with the same picture trying to sell the same BS. just report the account when you see it

lagrew27 @eve_headvsheart , I've reported them numerous times but their comments still keep reappearing. I'll try reporting their account

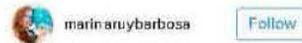
eve_headvsheart @lagrew27 me too. I just keep reporting. Tbh, it won't stop them but hopefully it proves more difficult

♡ Add a comment...

...

24. Endorser: Marina Ruy Barbosa Brand: Pantene Brasil

Source: https://www.instagram.com/p/BGC_T6KHn6c/?taken-by=marinaruybarbosa



53k likes

3w

marinaruybarbosa Meu kit @pantenebrasil de cuidados para o hair 🧖🏻 #NovoPanteneExpert #CasisDeHidratação

view all 295 comments

jujubalbuquerq Super aprovado!!!

micaelecaau Eu queroo!!

ataintobias Pra vc @natsila_liborio

jonycabbage Troco likes

yu riverasc Show @sofalrocha

cheerlesviitor Sdv

renatacremona Uit

silvanaribeiroamorim Tu usa Pantene?

@marinaruybarbosa?

brendhabahia123 adoro é muito bom

hidrata o cabelo bem

valsouza741 Legal

♡ Add a comment...

...

25. Endorser: Lisa Rinna Brand: ToGoSpa

Source: <https://www.instagram.com/p/BIAtYpqDZaG/?taken-by=lisarinna>



26. Endorser: Ashley Tisdale Brand: Laque Nail Bar

Source: <https://instagram.com/p/B1v70EAgyPw/>



27. Endorser: Anna Petrosian Brand: Kat Von D Beauty

Source: <https://instagram.com/p/BllcL8Vj1IO/>



annapetrosian_ [Follow](#)

7,040 likes 3w

annapetrosian_ I've heard so many amazing reviews about the 'Lock-It Collection' by @katvondbeauty Can't wait to show and tell! 🥰 #LockItRevolution

magdalenaxxo Dm me if u wanna get free stuff : makeup, clothes , phone cases . No bs 🙄

abbycarrasco_ The foundation is so good for oily skin!!

soulvibrationclothing 🥰🥰🥰

__corri_g @mrssanchez54

x0x0.amira It's my all time favorite foundation! 🥰🥰🥰

__michelle_1989 @lindsayask123

fanoula1826 I love it !! And so will you

katvondbeauty 🥰❤️

victoria_r_79 @annapetrosian_ can't wait to see what you think, this brand

🤍 Add a comment... 🗨️

28. Endorser: Maisie Williams Brand: Olive and June

Source: https://www.instagram.com/p/BECCMZmqhK/?taken-by=maisie_williams



maisie_williams [Follow](#)

49k likes 8w

maisie_williams dese guys👏

[view all 344 comments](#)

paperdollSarah_ @diana_silveran very close

jaasi.official3360 So cool

__camello @ismaaaa_el se liga na arte desse logo

__kathleenirena @janetharsono let's do this!!

Janetharsono @_kathleenirena bkinin dong lol

supermushy Woah, that's my daughters first and middle names! I didn't even know this was a thing 🥰

__linda_kara_ dese nails

jupfelix Vou fazer assim

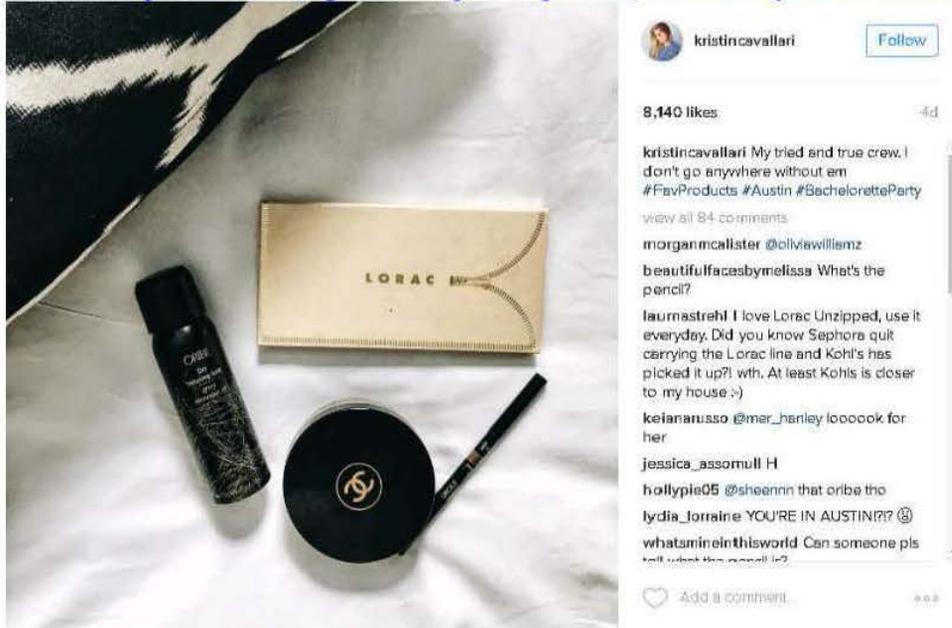
@henriquecapistrano

henriquecapistrano @jupfelix o q e isso

🤍 Add a comment... 🗨️

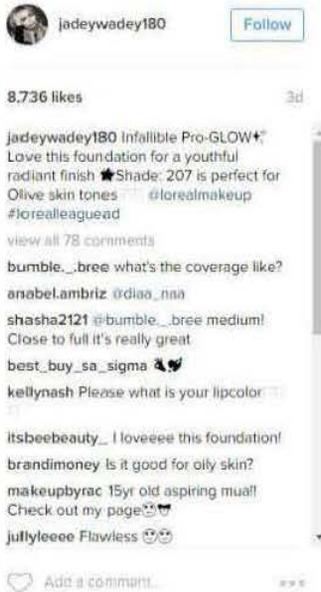
29. Endorser: Kristin Cavallari Brand: Lorac, Chanel

Source: <https://www.instagram.com/p/BGPqePkNQ6i/?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/BABLZYHKJyX/?taken-by=iansomerhalder>



iansomerhalder Follow

429k likes 22w

iansomerhalder Its a new dawn, its a new day-its a New Year. It's a good time to change things up to smell great and feel great. Azzaro Pour Homme Intense is Guaranteed to impress. It's beautiful. Truly, it's on me. I'm loving it. #AzzaroPourHomme

View all 3,445 comments

fatimakha_n @maez.azam we'll see

jane_esleig Meu ator preferido! Amooooooooo Ian&Damon

malu06suarez ♥♥

au brierstockel @jacob.dell

marcosgomes18 Te amo ♥

samirabereta Love love love 😍

a.kellis.13 #midnightisthebesttimecstalk

spiweave What's there names

farzan_____ I love u so much 😍😍

♥ Add a comment...

32. Endorser: Blake Lively **Brand:** L'Oreal

Source: <https://www.instagram.com/p/BFhQ1J0R4Bo/?taken-by=blakelively>



blakelively Follow

247k likes 3w

blakelively Why doesn't L'Oreal sell hot chocolate? It looks awesome in my hair. 🍫

View all 292 comments

rizzsamanta L'Oreal is testing their products on animals! PLEASE GO CRUELTY-FREE!!!

gabzwarts Feeling like hot chocccies 🍫 @clmipalgeputtergill

cararozgonyi Guess you don't care that @loreal is one of the worst companies with animal testing and what they do to those poor creatures. @blakelively

lanaaqx Elle est revenue ou quoi? @smbre_ferrie @mimilicouw

smbre_ferrie Non non c'était juste un throwback @lanaaqx @mimilicouw

♥ Add a comment...

33. Endorser: Victoria Beckham Brand: Lancer Skincare

Source: <https://www.instagram.com/p/BEHnSwdliPt/?taken-by=victoriabeckham>



 **victoriabeckham** [Follow](#)

60.3k likes 8w

victoriabeckham Loving this new contour Décolleté by my friend @drlancerrx kisses from Los Angeles us X vb

[view all 126 comments](#)

katjaminski Hilft das auch?

catherinedavies123 Nice

armyguy_ben Make \$1,000-\$10,000 With An Active Bank Account 📄 Text 12246990757 Or Direct Message 📧 Me For More Information.

islomxon_official @victoriabeckham

princessadatskaya_80_lvl @mason4ik 🤔🤔🤔

malinsu ndstroms @fridaedlunds 😊😊😊

eringer_experience Feel Fantastic

aisha_ali.x @adeelaxali @sxa.ali_x

amcblog Take look at the Quble makeup

 Add a comment... ⋮

34. Endorser: Victoria Justice Brand: Simple Skincare

Source: <https://www.instagram.com/p/BFAaZiJnIMi/?taken-by=victoriajustice>



 **victoriajustice** [Follow](#)

16.8k likes 3w

victoriajustice Hey guys, I'm partnering with @SimpleSkincare again to #TestTheWater by trying something new! I loved reading all your comments on my journaling post, so now I've decided to try kickboxing! What do you guys want to try? Tell me in the comments below using #TestTheWater 📸

[view all 1,052 comments](#)

kitten10lover Damn girrrl

selamhalex0 Shelby Marx?

eugene_thachosen1 Sky diving #TestTheWater @victoriajustice

nata13 Shelby Marx

heilee_june_25 Shelby

 Add a comment... ⋮

35. Endorser: Rach Parcell Brand: eos Products

Source: <https://www.instagram.com/p/BGMn94-mx2y/?taken-by=rachparcell>



36. Endorser: Emily Ratajkowski Brand: Nip + Fab

Source: 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/BBWPMCTwljp/?taken-by=behati prinsloo>



38. Endorser: Vanessa Lachey Brand: Yves Saint Laurent Beauty

Source: <https://www.instagram.com/p/BDldv5BNyP7/?taken-by=vanessalachey>



39. Endorser: Liza Lash Brand: L'Oreal

Source: <https://www.instagram.com/p/B1bh-rYA62I/?tagged=lorealleaguead>



40. Endorser: Vanessa Hudgens Brand: Illuminate Cosmetics

Source: <https://www.instagram.com/p/BG1pHP1zCs8/?taken-by=vanessahudgens>



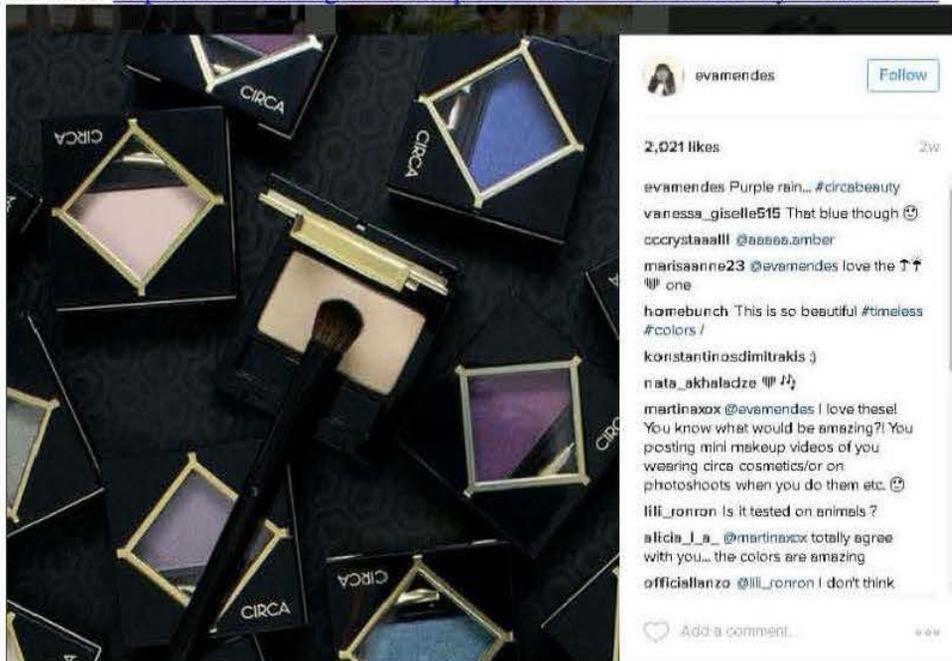
41. Endorser: Chelsea Houska Brand: SugarBearHair

Source: <https://www.instagram.com/p/BGSiAm5naw5/?taken-by=chelseahouska>



42. Endorser: Eva Mendes Brand: Circa Beauty

Source: <https://www.instagram.com/p/BFzMxlFBJoX/?taken-by=evamendes>



43. Endorser: Massy Arias Brand: SheaMoisture

Source: <https://www.instagram.com/p/BGViyUmrqAA/?taken-by=massy.arias>



 **massy.arias** [Follow](#)

7,759 likes 2d

massy.arias My skin care and "I need a slick pony tail after this crazy leg day" hair trick @Sheamoisture4u 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 acne/blemish prone skin, this soap and mask are bomb.com (same mask I had on Saturday on Snapchat: MassyFit). 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

 Add a comment... 

44. Endorser: Danielle Peazer Brand: L'Oréal

Source: https://www.instagram.com/p/BJV7_P7Abq_/?tagged=lorealparis



 **daniellepeazer** [Follow](#)

37.3k likes 2d

daniellepeazer Saturday's party face 🍷
lol jk I'm sat at home on my sofa because I had a late night last night 😊

#ldelelaneloves #beauty #bblogger
#makeup #lipstick #loreal #lorealparis
#redlips #fashion #lips #style
#makeupinspo

View all 101 comments

helloimeydee ^your
fatherdevs Lip goals

 Add a comment... 

45. Endorser: Amanda Bisk Brand: Biotherm

Source: <https://www.instagram.com/p/BGEiIzUGlxW/?taken-by=amandabisk>



46. Endorser: Lilly Ghalichi Brand: HAIRtamin

Source: https://www.instagram.com/p/BIX_wkyjNHU/?taken-by=lillyghalichi&hl=en



47. Endorser: Stephanie Pratt Brand: MatrixUK

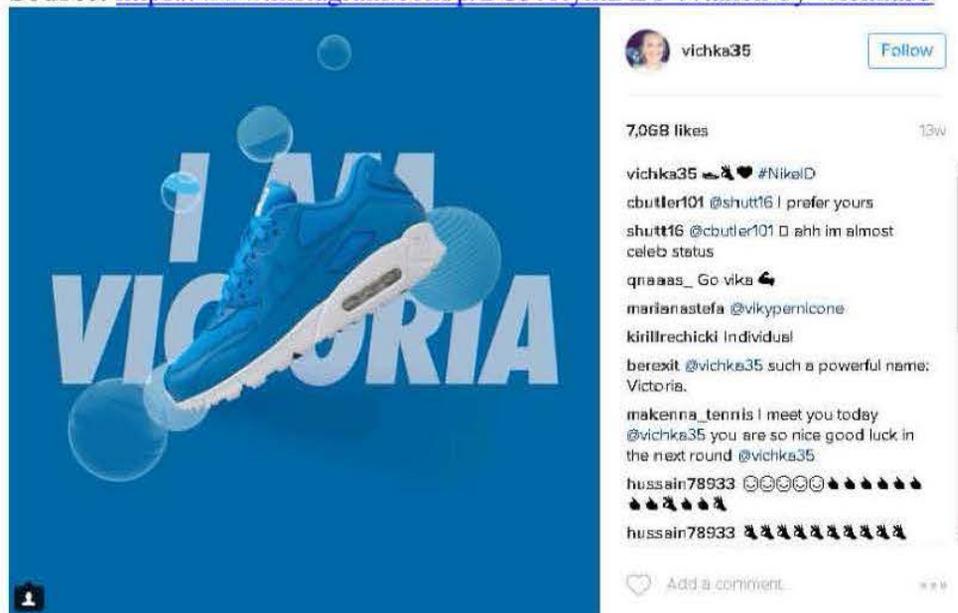
Source: <https://www.instagram.com/p/BI63EM8gN1I/?taken-by=officialstephpratt>



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/BC0QPiGSx-G/?taken-by=m_phelps00



50. Endorser: David Beckham Brand: Adidas

Source: <https://www.instagram.com/p/BEIBfZZzWdo/?taken-by=davidbeckham>



51. Endorser: Pharrell Williams Brand: Adidas

Source: <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>



53. Endorser: Michelle Wie Brand: Nike

Source: <https://www.instagram.com/p/BFbtkYjp-iD/?taken-by=themichellewie>



54. Endorser: Sydney Leroux Dwyer Brand: Nike

Source: <https://www.instagram.com/p/BFE5KsDGWEt/?taken-by=sydneyleroux>



55. Endorser: Gareth Bale Brand: Foot Locker Europe

Source: <https://www.instagram.com/p/BGEpbvIRFEH/?taken-by=garethbale11>



56. Endorser: Stephen Curry Brand: Coach Up

Source: <https://www.instagram.com/p/BDhB4QHxfex/?taken-by=stephencurry30>



57. Endorser: Drake Brand: October's Very Own (OVO)

Source: <https://www.instagram.com/p/BGaqWFCDQIR/?taken-by=champagnepapi>



58. Endorser: Luis Suarez Brand: Adidas

Source: <https://www.instagram.com/p/BDj5HmBQpHs/?taken-by=luissuarez9>



59. Endorser: Nicky Jam Brand: Adidas

Source: https://www.instagram.com/p/BF_5zPfCTdZ/?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/BFe3vD0LsK0/?taken-by=lukebryan>



lukebryan [Follow](#)

85.8k likes 3w

lukebryan Which one should I get? #HFE
view all 1,097 comments

hannawilson.hw I am your biggest fan ever

taylormitchell101 Too many to chose from

madi.ac I love youuuuuu

cole_peterson07 All of them @lukebryan

blake2562 I would like to meet u

ritazellig They're all beautiful works of art! But Luke, you should only get that 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! □□□□□□□□□□

cobey29 @tito_badito

repost the Cabela's... it should be...

♡ Add a comment... 4/4

62. Endorser: Marcelo Brand: Adidas

Source: <https://www.instagram.com/p/BGCgwyEKfEA/?taken-by=marcelotwelve>



marcelotwelve [Follow](#)

290k likes 1w

marcelotwelve 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 @uefachampionsleague medal and @adidasfootball #X16 boots!
No hay nada mejor que la sensación de ser el primero y quería compartir este sentimiento con vosotros. Ve a mi Facebook AHORA para ganar la medalla @uefachampionsleague y botas @adidas_ES #X16!
NÃO há uma sensação melhor do que ser o primeiro e quero compartilhar esse sentimento com você. Vai para o meu Facebook agora para ganhar a medalha de Champions e as chuteiras #X16! Boa sorte, mitol!

#FirstNeverFollows #Undecimo #M12

view all 1,870 comments

♡ Add a comment... 4/4

63. Endorser: Rickie Fowler Brand: Puma

Source: <https://www.instagram.com/p/BEoiBgTQu-j/?taken-by=rickiefowler>



64. Endorser: Niall Horan Brand: Nike

Source: <https://www.instagram.com/p/BFzgMIEMyOz/?taken-by=niallhoran>



65. Endorser: Kris Jenner Brand: Arthur George

Source: <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>



67. Endorser: Floyd Mayweather Brand: SubZero Recovery

Source: https://www.instagram.com/p/BGXy_rUx3ep/?taken-by=floydmayweather



floydmayweather
SubZero Recovery SD [Follow](#)

380k views 1d

floydmayweather Whenever I'm in San Diego or Las Vegas I do Cryotherapy with the only people I trust with my body, @SubZeroRecovery.

SUBZERO RECOVERY SAN DIEGO
1202 Kettner Blvd. Unit C
San Diego, CA 92101
619-800-2606

SUBZERO RECOVERY LAS VEGAS
5031 Wagon Trail Ave. #110
Las Vegas, NV 89118
702-720-3818

Whole Body Cryotherapy helps rejuvenate the body and promotes overall health. It helps with recovery for athletes, people suffering from chronic pain, and helps reduce inflammation and aches in joints and muscles. After only 2-3 minutes inside the cryosauna, you will feel instant energy and feel like you can get

[Add a comment...](#)

68. Endorser: Brad Richards Brand: Bridgestone Sports

Source: https://www.instagram.com/p/BE6131yEseI/?taken-by=brichards_1991



brichards_1991 [Follow](#)

1,683 likes 6w

brichards_1991 If you haven't tried Bridgestone clubs I suggest hitting the J15 CB. Thanks @bridgestonegolf

sydneymcneil happys

mrs_nemeth Happy birthday

e.grish Happy birthday

nick_ferenc Happy birthday

joeyy.33 We miss you in New York Brad!!

joeyy.33 Happy Birthday

jdeters Happy Birthday

egriebs Offseason be like

john_kennedy93 Happy birthday big guy! Hope to see ya on the island this summer!

brandonfame Happy birthday!

[Add a comment...](#)

4: Food and Beverage

69. Endorser: Porsha Dyanne Williams Brand: Flat Tummy Tea

Source: <https://www.instagram.com/p/BIH2Q6IgWk3/?taken-by=porsha4real>



70. Endorser: Lindsay Lohan Brand: Pinnertest

Source: <https://www.instagram.com/p/BDI2XIDJcyn/>



71. Endorser: Jenny McCarthy Brand: CD Vodka

Source: https://www.instagram.com/p/BHLVzcdApT_/?taken-by=jennymccarthy



72. Endorser: Zlatan Ibrahimovic Brand: Vitamin Well

Source: <https://www.instagram.com/p/BEDQBFwx00e/?taken-by=iamzlatanibrahimovic>



73. Endorser: Sophia Bush Brand: Sakara

Source: <https://www.instagram.com/sakaralife/>



sophiabush [Follow](#)

28k likes 5w

sophiabush Going plant-based for at least 2/3 of my meals, with the help of my #SuperSoul Sisters @sakaralife. Week 2. Loving this ❤️ #veganbeforesex #consciousliving #babysteps #alsohelpfulafterlastnightsmezcal

I'd like to clarify something for everyone who feels the need or right to comment on my choices. I'm sharing this because I'm a fan of the food, and how this incredible company works. I'm not sharing this so you can tell me what to do, how to live, or how this choice I'm making somehow isn't enough. My body. My choices. My life. Celebrate what people do well. If that's not enough for you, do better in your own life and save your judgement for yourself. K? Cheers.

[Add a comment...](#)

74. Endorser: Nicole "Snooki" Polizzi Brand: Flat Tummy Tea

Source: <https://www.instagram.com/p/BGajsY8Bjrb/?taken-by=snookinic>



snookinic [Follow](#)

35.2k likes 15h

snookinic There's just NO WAY I'm doing summer without a flat tummy. It's time to get summertime fiiline and my pack of Flat Tummy Tea has just got here 🍷🍷🍷 They've got a sale on today at 20% off so if you're prepping for summer, now's your chance - go check out the sale at @flattummytea

[View all 229 comments](#)

rayrob90 Are you the real Snooki from the jersey shore of so write me back and tell me what is everyone else doing from the show keep me updated thank you

[Add a comment...](#)

75. Endorser: Shay Mitchell Brand: Nettle Brand

Source: <https://www.instagram.com/p/BGPsuKFQr6F/?taken-by=shaym>



76. Endorser: Sean Combs Brand: Aqua Hydrate

Source: <https://www.instagram.com/p/BGaNNr4plwG/?taken-by=iamdiddy>



77. Endorser: Scott Eastwood **Brand:** Anheuser Busch

Source: <https://www.instagram.com/p/BDgXBEhEsqP/?taken-by=scotteastwood>



78. Endorser: Nick Lachey **Brand:** Anheuser Busch

Source: <https://www.instagram.com/p/5smbE7C3Oj/?taken-by=nicklachey>



79. Endorser: Naomi Campbell Brand: Clean Program

Source: <https://www.instagram.com/p/BF6d0zOo51m/?taken-by=iamnaomicampbell>



80. Endorser: Meek Mill Brand: Luc Belaire Winery

Source: <https://www.instagram.com/p/BF9jAclikJ6/?taken-by=meekmill>



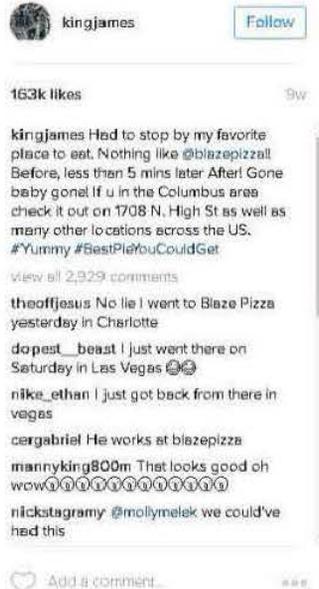
81. Endorser: Louis Tomlinson Brand: Red Bull

Source: https://www.instagram.com/p/BF_ZUZIr4Rg/?taken-by=louist91



82. Endorser: Lebron James Brand: Blaze Pizza

Source: <https://www.instagram.com/p/BDtX6H9iTMX/?taken-by=kingjames>



83. Endorser: Kourtney Kardashian Brand: Popeyes

Source: <https://www.instagram.com/p/BFepPAxE1qY/?taken-by=kourtneykardash>



84. Endorser: Khloe Kardashian Brand: Fit Tea

Source: <https://www.instagram.com/p/BFjmYrfhRt4/?taken-by=khloekardashian>



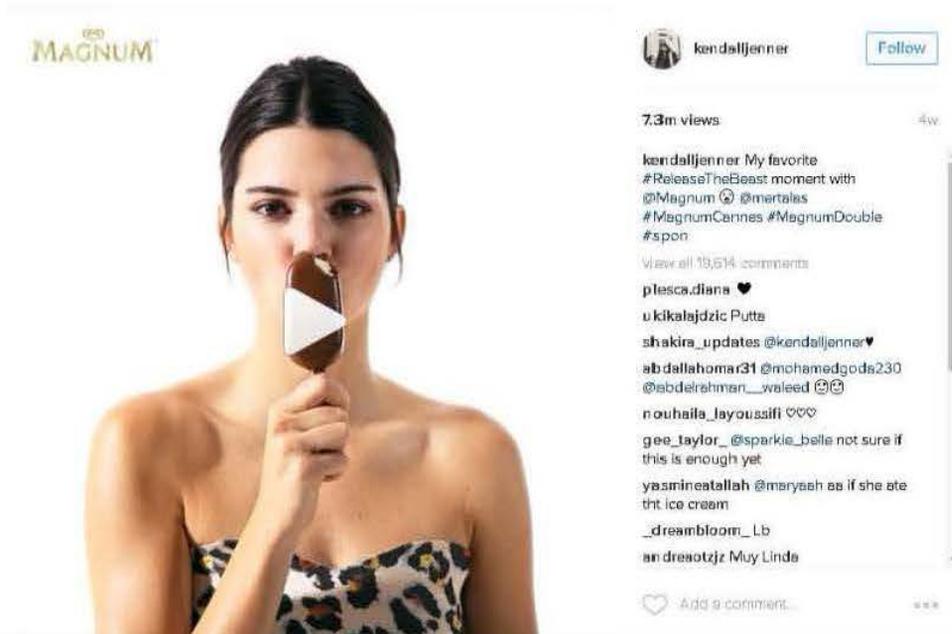
85. Endorser: Kevin Durant Brand: Sparkling Ice

Source: https://www.instagram.com/p/_R1mBZzSk8/?taken-by=easymoneysniper



86. Endorser: Kendall Jenner Brand: Magnum

Source: <https://www.instagram.com/p/BFTXyc0DoI4/?taken-by=kendalljenner>



87. Endorser: Jay Alvarez Brand: Haleiwa Bowls

Source: https://www.instagram.com/p/BGIs4uhMm_w/?taken-by=jayalvarrez



 jayalvarrez [Follow](#)

363k likes 1w

jayalvarrez @haleiwabowls best bowls in the world :) #Moichbowl 🍌🍌🍌🍌

[view all 2,248 comments](#)

- missincapanda 😊😊
- ambarvalecllos Lo amo Bro
@quinteromichel9 🍌
- fknreyna @undepeee
- maicsmith On top 🍌
- sarahhwillow @coleydavison
- raazgolestani_secret my boy 🍌🍌🍌🍌
- is.abellalee @shakarim 😊😊
- omermorad This is your only jeans?
- emmiemmaa 😊😊🍌 traum.. @enillessa
- enillessa @emmiemmaa jaaa😊🍌
- lina.pth @felinawtr 😊
- shakarim The food 🍌🍌 @is.abellalee
- letsgetthisbowls L AM THE

 Add a comment... ...

88. Endorser: James Harrison Brand: Optimum EFX

Source: <https://www.instagram.com/p/BGac5TpJFjb/?taken-by=jhharrison92>



 jhharrison92 [Follow](#)

2,088 likes 5d

jhharrison92 The only products I use to optimize my workouts & recovery process are created by @optimumefx. You can get them all for 15% off with the code: Deebo15 at OptimumEFX.com!

josee_ribe 1

bxl.is.life_ 100

tommygropp @nfi

titsbu rghfeelers6 @nfi

theinstarucc @nfi ... It saddens me that there are certain hard working athletes that get singled out so blatantly and have to deal with harassment (probably on a day when some gym time, alone time, and some nice quality family time have already been planned... Let the man work and continue his strive for betterment.

 Add a comment... ...

89. Endorser: Heidi Klum Brand: Dunkin' Donuts

Source: <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>



91. Endorser: Chris Pratt Brand: Caveman Coffee

Source: <https://www.instagram.com/p/vi4Eb-jHEX/?taken-by=prattprattpratt>



92. Endorser: Caroline Manzo Brand: HelloFresh US

Source: <https://www.instagram.com/p/BIDwcZ1gN8X/?taken-by=carolinemanzo>



93. Endorser: Brody Jenner Brand: Lay's

Source: <https://www.instagram.com/p/BFm3pkpsIBg/?taken-by=brodyjenner>



94. Endorser: Anne Hathaway Brand: Kreation Organic

Source: <https://www.instagram.com/p/BFmzS2lI0Ii/?taken-by=annehathaway>



95. Endorser: Akon Brand: Vodka Beluga

Source: <https://www.instagram.com/p/BEWY4kDFsD0/?taken-by=akon>



akon Follow

5,202 likes 5w

akon Holidays with @vodkabeluga always great. #VODKABELUGA

view all 57 comments

kmg_kme @akon produce me KMG HEEM ON SOUNDCLOUD #kmg #repost #follow #signMe #africa2USA #GUINEA

naveenk1 Love

photogenictwins Xplz give me a chance, love music

desertchylid Beautiful set up 🍸

andybucaille Bed bad bad

jay_mo_ney Big funds are waiting..paste your CANADA & USA bank drop,TD bank, Chasebos,Keybank,Regions,Citizen bank, perfed credit union & BB&T etc..add me up 7ABA718B

flaber16 6enyra 36c emra

limounge Amazing 🍸🍸🍸🍸🍸🍸🍸🍸🍸

♡ Add a comment... 000

96. Endorser: 50 Cent Brand: Effen Vodka

Source: https://www.instagram.com/p/BGS8h_LML20/?taken-by=50cent



50cent Follow

75.7k likes 3d

50Cent Boy I pull up looking like a TWIX, on these Hoe's LMAO IM ALL THE WAY UP. #EFFENVODKA #FRIGO

view all 1,280 comments

brooklynmusclefitness These rappers not realer than you big guy @50cent u in Brooklyn with luxury no cops #real!

nico_notnice @@@

rifle_mann We need some of that get rich or die trying type of music my rigga @50cent

restyl504 🍸🍸🍸🍸🍸

darko_bess Beg for mercy is my classic. It's the best without yayo and kid kid n the game.

cgucci84 🍸🍸🍸🍸🍸

jequeta23 Nicet But that twix though 🍸

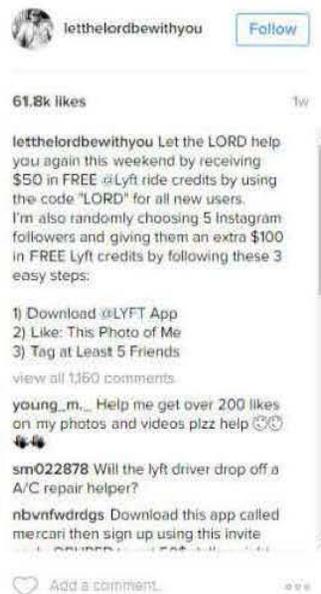
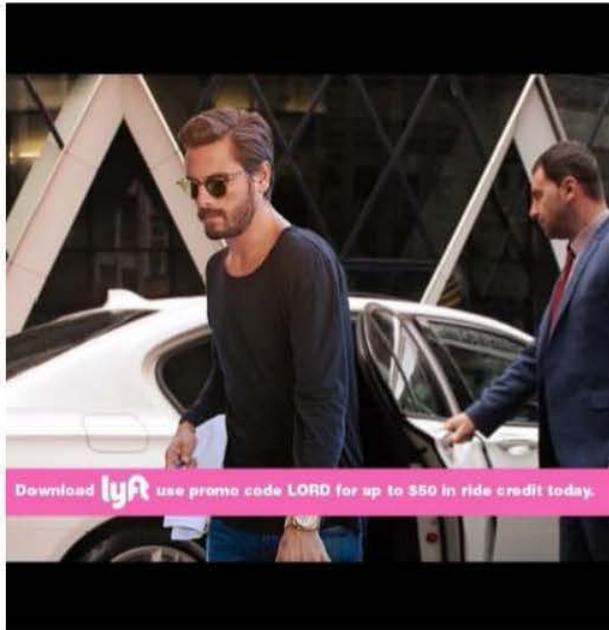
☺️ you had me running to the corner store. 🍸

♡ Add a comment... 000

5: OTHER

97. Endorser: Scott Disick Brand: Lyft

Source: <https://instagram.com/p/BI--VokgXRg/>



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>



100. Endorser: Vanessa Hudgens Brand: My Little Pony

Source: <https://www.instagram.com/p/BldKwYYhEIL/>



101. Endorser: Gigi Hadid Brand: BMWSource: https://www.instagram.com/p/BEL_hoZjCer/?taken-by=gigihadid**102. Endorser: Neymar Brand: Airbnb**Source: <https://www.instagram.com/p/BGNhOXaxtY/?taken-by=neymarjr>

103. Endorser: Snoop Dogg Brand: Mercedes

Source: <https://www.instagram.com/p/BGSRSNbP9F-/?taken-by=snoopdogg>



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=giulianarancic>



106. Endorser: Ciara Brand: Jeep
Source: <https://www.instagram.com/p/BFCIHnUyHiW/?taken-by=ciara>



107. Endorser: Asap Rocky Brand: Mercedes

Source: <https://www.instagram.com/p/BFruTdvha4z/?taken-by=asaprocky>



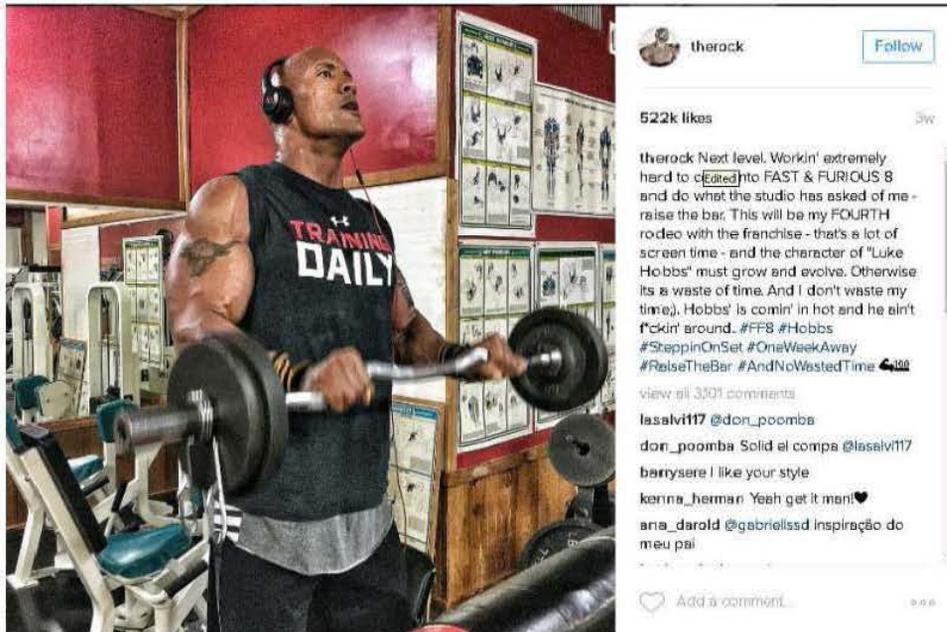
108. Endorser: Missy Elliott Brand: Beats

Source: <https://www.instagram.com/p/BAVg0A4lvXX/?taken-by=missymisdemeanorelliott>



109. Endorser: Dwayne "The Rock" Johnson Brand: Under Armour

Source: <https://www.instagram.com/p/BFemb4jIh-c/?taken-by=therock>



110. Endorser: Abby Lee Brand: The Davenport Grand Hotel

Source: <https://www.instagram.com/p/BGNy88RCGuY/?taken-by=therealabbylee>



111. Endorser: Irina Shayk Brand: Sirin Labs

Source: <https://www.instagram.com/p/BGJ6Btat-Si/?taken-by=irinashayk>



112. Endorser: Allen Iverson Brand: IO Moonwalkers

Source: <https://www.instagram.com/p/8mlhWjicuw/?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, 2016¹ 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 examples² 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 Influenster 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 Influenster's website directs users to use a discloser,³ our survey suggests that most fail to do so and only tag Influenster and the brand being promoted.⁴ Bzzagent does not instruct influencers to use the proper #advertisement or #ad disclosure at all. Instead, it instructs influencers to use #GotItFree or #GotACoupon.⁵

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 Influenster 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

¹ Public Citizen (2016). Retrieved from <http://www.citizen.org/documents/Letter-to-FTC-Instagram-Endorsements.pdf>.

² See Appendix A

³ Influenster (2016). Influenster 101: Proper Disclosure. Retrieved from <https://www.influenster.com/article/influenster-101-proper-disclosure>.

⁴ See Appendix B

⁴ Bzzagent (2016). Disclosing online. Retrieved from <https://www.bzzagent.co.uk/pg/DisclosureSupport>.

Appendix A

Table of Contents

Fashion	Images 1-9
Beauty Products.....	Images 10-21
Fitness and Weight Loss.....	Images 22-35
Food and Beverage	Images 36-44
Other.....	Images 45-50

1. Endorser: David Beckham

Brand: H&M

Followers: 29.9m

<https://www.instagram.com/p/BK0AtH3BrcF/?taken-by=davidbeckham&hl=en>



2. Endorser: Lucy Hale

Brand: We The Dreamers

Followers: 16m

<https://www.instagram.com/p/BMkKu-EBGE0/?taken-by=lucyhale&hl=en>

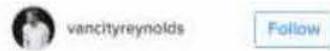


3. Endorser: Ryan Reynolds

Brand: Piaget

Followers: 7.1m

<https://www.instagram.com/p/BH4uW9IBq5W/?taken-by=vancityreynolds>



345k likes 14w

vancityreynolds Fantastic presenting @piaget Polo 5 watch in Brooklyn last night. I'm still holding this pose nearly 9 hours after the last person left the party. I'm in tremendous pain.

view all 1,392 comments

clodypao Good night, @karta.cabren.543

roxy_15h Hott

forarsineyday @erethiako purrrr
with [code](#) [EMRATA15](#)

👍 Add a comment...

4. Endorser: Emily Ratajkowski

Brand: Daniel Wellington

Followers: 8.9m

<https://www.instagram.com/p/BMCjEJVDa2E/?taken-by=emrata&hl=en>



281k likes 5d

emrata Loving my new @danielwellington #DWclassicblack watch 📍get yours with code EMRATA15

view all 1,598 comments

_shannon_brae 🐼 🐼

majocas28 @fernandogb.5

raysv92_21 @alexasandovalgiz mi otra morrita, la éma

nielumelrose @kamila_mora1

kamila_mora1 @nielumelrose I'm gonna get it

_shannon_brae 🐼 🐼 🐼

diaryyenne the most beautiful

malinovskam @therealtodd_cons 🐼 🐼

miss_lolita_yann tres jolie la montre ces quelle marque

therealtodd_cons @malinovskam dada❤️❤️ debrecen

👍 Add a comment...

5. Brand: LuLa Roe

Endorser: Lindsey Wheeler

Followers: 36.6k

<https://www.instagram.com/p/BMeoJB5Dq5f/?taken-by=lularoelindseywheeler>



 **lularoelindseywheeler**
LuLaRoe Lindsey W... [Follow](#)

796 likes 23h

lularoelindseywheeler A LuLaRoe Carly dress and a camel vest, perfect for a cool Sunday morning! ☀️ Off to church with my sweet little family, wishing you a wonderful day with the ones you love too! 🍷❤️ XoXo Linds! #lularoecarly #lularoe #lularoe #lularoelindseywheeler #lularofashion #lularoinlove #lularofood #lularoemoments #sundayfunday #privstyle #simplycomfortable

nikkipowell08 Cutest Lularoe consultant EVER!

antobonazzone 🍀🍀🍀 Cute pic!

molney12 I adore your posts! 🍷 awesome fashionista!

motorcitylove You always look perfect and I love your hair cut, love!

lularoe_jessicapreece Simply Amazing you are!!! 🍷

🍷 Add a comment... ...

6. Endorser: Rickie Fowler

Brand: PUMA

Followers: 1m

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



 **rickiefowler** [Follow](#)

173k views 3h

rickiefowler The new #IGNITEEvoKNIT is 🔥🔥🔥 #RunTheStreets @PUMA

view all 242 comments

kayleehuh looks so nice!! 🍷🍷

thedavidputman @jordanmunford

joestomare16 @ben.chesak bruuuh

ricky__1313 @j.crewse

trond_ole 🍷🍷🍷

alexellison3 @derjmeng omg

dilo1492 @tyber_22_

bmass_d @akrowdy you see these?

akrowdy @bmass_d nope but they flashy

dilo1492 @k_johnson523

kholvan25 @kh.lintran hợp nty nè --"

tuftonthemastiff @siobhanhaw 🍷🍷🍷🍷🍷🍷 @rickiefowler

🍷 Add a comment... ...

7. Endorser: Kris Jenner

Brand: Arthur George

Followers: 15.4m

<https://www.instagram.com/p/BMSxVmTA1xY/?taken-by=krisjenner&hl=en>



8. Endorser: Heidi Klum

Brand: MCM

Followers: 3.2m

<https://www.instagram.com/p/BMIyMV7AEcg/?taken-by=heidiklum&hl=en>



9. Endorser: Demi Lovato.
Brand: New York Color Canada
Followers: 48.4m

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



10. Endorser: Chrissy Teigen
Brand: Lamer
Followers: 8.8m

<https://www.instagram.com/p/BKzNPzygC8n/?taken-by=chrissyteigen>



11. Endorser: Amadea Muse

Brand: Lime Crime

Followers: 450k

https://www.instagram.com/p/BMobgNbg7M/?taken-by=amadea_dashurie



12. Endorser: Valentina Vignali

Brand: Hair Burst

Followers: 691k

<https://www.instagram.com/p/BMeihtVhO4S/?tagged=hairburst>



13. Endorser: Kourtney Kardashian

Brand: Manuka

Followers: 48.5m

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



kourtneykardash

Follow

2m views

1w

kourtneykardash I love the ApiRefine Illusionist Rapid Lift Mask for instantly smooth, plump and firm skin. The 10 minute skin miracle from @manukad! Plus, it's on sale at the moment! #ManukaAmbassador #BeeingKourtney
view all 812 comments



Add a comment...

0 0 0

14. Endorser: Nathan Lassyri

Brand: Amour Noir

Followers: 849

<https://www.instagram.com/p/BMhf4M7DrcF/?taken-by=nathan.lassyri>



nathan.lassyri

Follow

122 likes

2d

nathan.lassyri Soooo excited to test this out @amournoirpolish 🤩 I'm gonna be hitting the streets like 🤪🤪🤪 #amournoir #snive #happy



Add a comment...

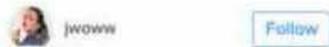
0 0 0

15. Endorser: Jenni JWOWW

Brand: FabFitFun

Followers: 4.7m

<https://www.instagram.com/p/BK8cJ21jYfe/?taken-by=jwoww&hl=en>



20.3k likes 2w

jwoww This is some serious #boxgoals right here. So in love with my fall box from @fabfitfun. The ModCloth scarf is so cute and cozy and there are so many new beauty products that I can't wait to try (like the night serum, eyeshadow palette by Pure Cosmetics, brow gel and so much more! Use code JENNI at www.fabfitfun.com for \$10 off if you don't already get their boxes. You will not be disappointed! #fabfitfun #ffpartner

View all 75 comments

lesliewilliams2010 Love mine too! Wish we could hang out with our scarves on and sip coffee from our new cups!! ☺

enchantedvoyages @jwoww what kind of foundation do you use?

__angelak__ Mom, I wanna get these boxes! Sarah gets them and gets such cool stuff! @mother.04

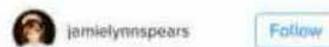
Add a comment...

16. Endorser: Jamie Lynn Spears

Brand: FabFitFun

Followers: 1.2m

<https://www.instagram.com/p/BK1JNLGB9Cs/?taken-by=jamielynnspears&hl=en>



9,577 likes 5w

jamielynnspears Y'all, I'm obsessed with the new @FabFitFun Fall box! I've been using the brow gel and eye shadow every day and they've completely changed my outlook on makeup. You can use the code JLS for \$10 off at www.fabfitfun.com, if you don't already subscribe... Best decision I've ever made. #fabfitfun #ffpartner

View all 50 comments

tatumdavissolis88 @jamielynnspears yes the socks are awesome for yoga! I always get good stuff in @fabfitfun for

Add a comment...

17. Endorser: Kim Zolciak-Biermann

Brand: FabFitFun

Followers: 2.2m

<https://www.instagram.com/p/BMR6xu7Bdzr/?taken-by=kimzolciakbiermann>



 kimzolciakbiermann [Follow](#)

8,286 likes

kimzolciakbiermann I love @fabfitfun this box is amazing! First off it has one of my faves Oscar Blandi dry shampoo (stay fresh after your workout), the portable power bank (keeps your phone charged on-the-go, Jock and Nona necklace (adorable gold, fall accessory) all the products come full size! ❤️ use my code "DONTBETARDY" for \$10 off your first box! www.fabfitfun.com #FabFitFun #FFFPartner #MyFav ❤️

[view all 79 comments](#)

hayleygard1985 @kennedynena Did you order a box?

hayleygard1985 @loraemc67 I would contact them. I know someone posted up they got there first box 2 months later.

boombarapp @kimzolciakbiermann store all your #loyaltycards #storecards #rewardcards on your #iPhone or #Android! Thanks for the amazing products!

 Add a comment...

18. Endorser: Maci Bookout McKinney

Brand: fatfitfun

Followers: 3.3m

<https://www.instagram.com/p/BKImdn8h3yl/?taken-by=macideshanebookout>



 macideshanebookout [Follow](#)

18.1k likes

macideshanebookout Another season, another amazing box. Thanks @fabfitfun. Use code MACI for 20% off your fall box at www.fabfitfun.com. [Six of the products from this box are from female-founded companies. Love that they're supporting fellow #girlbosses] #fffpartner #fabfitfun

[view all 63 comments](#)

christinabellitti_ @angienewman5 hers has the scarf!

angienewman5 Not worth over \$200! (seriously think so)

 Add a comment...

19. Endorser: Ashley Benson

Brand: Nip and Fab

Followers: 14.5m

<https://www.instagram.com/p/BLwC3hZho7O/?taken-by=itsashbenzo>



20. Endorser: Victoria Beckham

Brand: Estee Lauder

Followers: 12.7m

<https://www.instagram.com/p/BKWNmLJA5F6/?taken-by=victoriabeckham>



21. Endorser: Shay Mitchell

Brand: Biore

Followers: 14.3m

<https://www.instagram.com/p/BLZrgpUBp1O/?taken-by=shaym&hl=en>



 shaym [Follow](#)

1.2m views

shaym i can never perfect the art of the boomerang but this one was a win thanks to @bioreus 's Baking Soda Scrub that fizzes & bubbles when I wash my face almost like a mini spa-day for my pores! 🌟💕 #TBT #BioreAmbassador

view all 793 comments

rithicus My favorite! est Boomerang clip... 🤔

tony_argy @shaym haha I just wrote an essay about you and your biore pore-cleansing strips ad!!

agneserosali Love youuuu @shaym

lnj24255 🤔🤔🤔

..mycolors_ 🤔🤔

kalmar @thedarkside... You & Shay look so much alike!

thedarkside... @i.amani i get that a lot 🤔

🤔 Add a comment... 🌐

22. Endorser: Tiona Fernan

Brand: FlatTummyTea

Followers: 173k

<https://www.instagram.com/p/BLrkAqQhxU7/?taken-by=xttiona&hl=en>



 xttiona [Follow](#)

13k likes

xttiona Loving the difference @flatummytea makes to my body. Girls, go get yours today! 🤔🤔 #flatummytea

view all 139 comments

hughley4306 Sevy

mayorjuandon Lie / / / 🤔

mayorjuandon And watch her j On n smani_watson @zbrheelite

juanchuuz_red Chronic 🤔

fecundaglenn Nice slim body

finife_ what i gotta doooooo 🤔

red_siv Uh jae je to bahrain bien tort

..kovl_kerv_ 🤔🤔

dollie_ka Osiu

ernaud.roberto You body kill my girl 🤔

kinguama 🤔🤔

taninoate 🤔

🤔 Add a comment... 🌐

23. Endorser: Alexis Fawx

Brand: FlatTummyTea

Followers: 208k

https://www.instagram.com/p/BLrOKTiD4Wx/?taken-by=alexis_fawx&hl=en



24. Endorser: Farrah Abraham

Brand: FlatTummyTea

Followers: 773k

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



25. Endorser: Sveta Bilyalova

Brand: Fit Tea

Followers: 4.1m

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



26. Endorser: Maci Bookout McKinney

Brand: FlatBellyTea

Followers: 3.3m

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



27. Endorser: Stephanie Pratt

Brand: Thermo Thrive

Followers: 804k

<https://www.instagram.com/p/BKiJV6SgeVI/?taken-by=officialstephpratt>



 officialstephpratt [Follow](#)

2,259 likes

officialstephpratt Time to train @jasonbonept I've taken my #ThermoThrive w breakfast & bringing my water bottle w a scoop of #electrodrink. #togetherwystephani www.nutritionbysteph.com #energy #metabolismboost #endurance

minimabows 🏹

paristylecm Xoxo from Rome 🇮🇹

supermotoman_173 Enjoy

theo_baysat There you go 🍷

bethankemp @laura_m1990

statement_gem @officialstephpratt we'd love to send you some jewels 🍷

astridclarke 🍷

chynahmajor I got my bottle today! thank you @officialstephpratt 🍷

🍷 Add a comment...

28. Endorser: Denice Emoberg

Brand: Nutramino

Followers: 362k

<https://www.instagram.com/p/BLdQU6glde/?taken-by=deniceemoberg>



 deniceemoberg [Follow](#)

1,563 likes

deniceemoberg This is a new pre workout product from @nutramino 🍷 I have tried it a couple of times now and WOW I like it, you can read more about them on the blog @deniceemoberg 🍷

deniceemoberg #Nutramino #gymshark #deniceemoberg #fearless #fitness #fit #fitspo #workout #bodybuilding #gym #training #healthy #motivation #getfit #eatclean #exercises #workoutvideos #recipes #flex #instafitness #gym #trainhard #dedication #muscles #shredded #girlswholift #glutes #trainlikeagirl #noexcuses #girlswholift #trainlikeagirl #noexcuses #instafitness

🍷 Add a comment...

29. Endorser: Jazmine Garcia

Brand: EHP Labs

Followers: 260k

<https://www.instagram.com/p/BMC3a3hhAnN/?taken-by=jazzypoo>



 jazzypoo [Follow](#)

9,348 likes

jazzypoo GUESS WAAAAT, As you guys know, I only mention when @EHP Labs has some major plugs for you guys. The last one was BOGO Free on Protein but noooooo we got this. If you purchase an EHP Labs Mystery Bag you can get up to \$700 on products for \$97 🤪

Use code JAZZYTREAT for a special gift at check out, wweees 🥰

As always, feel free to ask ANY questions regarding this and I'll get back to ya!

view all 111 comments

jazzypoo @_bfx really? I just checked it and it's working for me, I'd try again :)

_michaldziedzic @vionnyle There she is

_bfx @jazzypoo yay got it 🥰 can't

[Add a comment...](#)

30. Endorser: Dickerson Ross

Brand: EHP Labs

Followers: 1.4m

<https://www.instagram.com/p/BLYPN-ShbPX/?taken-by=dickersonross>



 dickersonross [Follow](#)

23.5k likes

dickersonross The Gym... Making shit days into good days!

One of the very few Supps I use is @ehplabs #oxywhey 2-3 X a day for added protein & recovery! Check them out & use Code: 'ROSS10'

Don't Miss Out! Receive a Massive 40% Off All Cut & Bulk Plans on my site with Discount Code: 'OCTOBER'

View Here... Link in bio
@DickersonRoss

WWW.DICKERSONROSS.COM

#DickersonRoss #aesthetics

view all 141 comments

mikolajolzewski @blasphemry taki np

nikiesbornhoeff @juliantrck gym goals,

[Add a comment...](#)

31. Endorser: Ashley Kaltwasser

Brand: EHP Labs

Followers: 615k

<https://www.instagram.com/p/BMNaCKD6wv/?taken-by=ashleykfit&hl=en>



32. Endorser: James Harrison

Brand: Optimumefx

Followers: 487k

<https://www.instagram.com/p/BMpY1otDMAf/?taken-by=jhharrison92>



33. Endorser: Giuliana Ava

Brand: Fate Fuel

Followers: 101k

<https://www.instagram.com/p/BMb7UQBjANT/?taken-by=giulianaavafit>



 giulianaavafit [Follow](#)

684 likes

giulianaavafit Fate fuel... 🍷

Code 'giuliana40' for \$ off

anthony.rhodes 🙌🙌🙌

fatefit 🍷

x_arce 🍷🍷🍷🍷🍷

max_chieng 🍷🍷🍷

alex347567567 Lol is that red lambo

teesquare but whose car?? 🙌

vin.rizzotti Lamborghini mercy, all these dudes so thirsty #HAANN

[Add a comment...](#)

34. Endorser: Nina Agdal

Brand: Muscle Milk

Followers: 1.4m

<https://www.instagram.com/p/BLy70TzgDYQ/?taken-by=ninaagdal&hl=en>



 ninaagdal
Overthrow New York... [Follow](#)

35.1k likes

ninaagdal Spent my morning in the ring with @MuscleMilk @BoxingNapoleon 🍷 #StrongerEveryday

view all 222 comments

aykibbs @ltelephant ughthhh

aneeshalabroo @sahitamn @mgmnmn @calinesaker 🙌🙌🙌

that80srocker3383 Sure you did. That's what boxers do!

shihan2013 Awesome!! 🍷🍷🍷🍷 @boxingnapoleon

realkshipp @jrpaley

jokinrom Te meto una ostia...

howard_ahon 🍷🍷🍷🍷

thegirlwith_theblondestreak She's 24 and Leo's 41. Ew wtf

justalien 🍷

dean_fiacco Love it!

[Add a comment...](#)

35. Endorser: Porsha Dyanne Williams

Brand: Colombian Waist

Followers: 2.5m

<https://www.instagram.com/p/BLrBc1bhSKB/?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/BLtUWPgAIR4/?taken-by=officialstephpratt&hl=en>



 officialstephpratt [Follow](#)

2,009 likes

officialstephpratt My bestie brought over @twistedhalouk 90 calories of YUM! Excited for your event tomorrow @twistedhalouk 🍋🍋🍋

staceymarshalltaylor Love that bracelet @officialstephpratt if you wouldn't mind telling me where you got it? Xx

laurenily25 90 cals woop! @officialstephpratt

ketchup1957 Babes @wfever20 coconut water & ginger vodka 🍋

wfever20 @ketchup1957 🍋🍋🍋

xfrankx @izzieroscaix

karalynnarr @rhigwynne13 they have Halo drinks! 🍋

maryclairedonnelly @anthomson ?????? 🍋🍋🍋

rhigwynne13 @karalynnarr omg those look soooo delicious 🍋🍋

[Add a comment...](#) [...](#)

38. Endorser: Chelsea Houska

Brand: Love With Food

Followers: 3.9m

<https://www.instagram.com/p/BKEyWuDDq0M/?taken-by=chelseahouska>



 chelseahouska [Follow](#)

50.7k likes

chelseahouska In love with my @LoveWithFood Snack Box. The snacks are perfect for Aubree's lunch and my pregnancy cravings. For every box sold at least one meal is donated to a food bank! Check out @lovewithfood's bio for 25% off your first deluxe box!

[View all 96 comments](#)

mellisrodz @lesrodz since you said you wanted to get a snack box subscription signed_a_ That's it? Just one meal? \$40 can buy more than one meal. What a rip off!

lovewithfood @signed_a_ its \$19.95/ month for 16-20 snacks and 2 meals are donated. Click 📌 on link in our bio to get 25% off your first box

austinpizzelli NEVERRRR! 🍋

winsogna I saw that you were showing...congratulations SO SO Verv

[Add a comment...](#) [...](#)

39. Endorser: Michael Phelps

Brand: Blue Apron

Followers: 3.1m

https://www.instagram.com/p/BLNBgK1AE2f/?taken-by=m_phelps00



m_phelps00

Follow

144k likes

2w

m_phelps00 Time for a cook off!!
@nicole.m.johnson has chicken and I get to make fish! #datenight @arschmitt is the 3rd wheel @blueapron

view all 530 comments

artsy...madison13 Congrats on getting to walk on the Ravens field!

summer_loves_horses_ Ravens🐾🐾

hyposwim @m_phelps00 where can I get that GOAT shirt??

heidjackson796 Hey Michael! You and Allison (maybe not Nicole as she's still

♡ Add a comment...

...

40. Endorser: Dwight Howard

Brand: Coca-Cola

Followers: 1.9m

<https://www.instagram.com/p/BL1CLATBgTi/?taken-by=dwighthoward>



dwighthoward

Follow

7,865 likes

5h

dwighthoward Atlanta is HOT! But, if U get thirsty during your dream weekend, my @CocaCola friends have got your back! But you can't WIN my dream weekend if you don't ENTER! Can't wait to see what we can do with your help! #TrueToAtlanta #NBACares #BeGr8. Go

♡ Add a comment...

...

41. Endorser: Jennifer Lopez

Brand: Vodkabeluga

Followers: 52.4m

<https://www.instagram.com/p/BJ04NxjAx-/?taken-by=jlo>



 jlo Follow

626k likes 7w

jlo #TBT to my Birthday weekend in Vegas!! Thanks again @vodkabeluga #vodkabeluga

view all 11,327 comments

myid6536 ستم چترى

myid6536 هوى

la_leona_de_ponce_ Eres hermosa tus hijos muchas bendiciones JLO y feliz Marc 🍷🍷🍷

nurse_wah You are the hottest 47 year old on this planet!! @jlo 🍷🍷

mastique87 🍷🍷🍷🍷🍷

get_right_sos_ 🍷

jasem_hosseinpour_1990 Excellent and perfect like always 🍷🍷🍷🍷🍷🍷🍷🍷

mickjigga 🍷

pete_rx @they_call_me_bak_ I sny lma

 Add a comment... ...

42. Endorser: Emily Ratajkowski

Brand: EFFEN Vodka

Followers: 12.3m

<https://www.instagram.com/p/BLLtNjugXub/?taken-by=50cent&hl=en>



 50cent Follow

34k likes 2w

50cent @jlo gives D's something to inspire to. E MIBB top of the game. #EFFENVODKA

view all 588 comments

g_self @kassoufby_

__taje Raspberry is my fav!! Just so hard to find!

delacracks @__loyal favors

__loyal @delacracks we need all except cucumber

antthehellfirefly I gotta try this they got mad flavors

ajbenzz I need that green apple in my life specially for the holidays 🍷🍷

cheyonnykel_model I've never heard of this! 🍷🍷 Orange and cucumber sound amazing

lamverses 🍷🍷🍷🍷

 Add a comment... ...

43. Endorser: Caroline Manzo

Brand: Hello Fresh

Followers: 497k

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



3,891 likes 2w

carolinemanzo Keeping on my healthy kick in the kitchen tonight with @hellofresh. Since all the fresh ingredients are pre-measured for perfectly portioned meals, I don't have to think about meal planning and can just start cooking! Love that I have @hellofresh to switch it up when I just don't have the time to grocery shop and meal prep. Give it a try with my code "FreshCaroline" for \$35 off your first healthy week at hellofresh.com #falmeals #healthy #hellofreshpics #ep

view all 54 comments

karenstepanoski I love it too. You don't have to think what's for dinner

kathleengreen2 Love ❤️ Keep it up!

yesmydaring07 Nice idea but expensive for what you get

jcaffa13 Go you! You've always been one

♡ Add a comment... 3/4

44. Endorser: Puff Daddy

Brand: Ciroc

Followers: 7.2m

https://www.instagram.com/p/BMrttMZA_tx/?taken-by=iamdiddy



12.1k likes 2d

iamdiddy #ciroc mango #tryit #WHYNOT
view all 160 comments

fleek_funny_fitness_faith_2016 F..b

floydmayweather_4eva MY FAV!

GETTIN RITE OFF THAT RITE NOW!

sophandfood

fjtheudkdnfth puff daddy deposited me a million dollars cuz he know im a hero

g_slan_m I'll surely be buying some tomorrow!

stackjones #ciroc mango #WHYNOT

#TheNextLevel #CirocVodka

#SeanJohnNewFragranceForMen

#SeanJohnNumberONE #KING

#ALWAYSEANJOHN #badboy

mRad_bllf_13 Light me

southbeat1017 Pls kindly follow me

instagram trap beat videos view

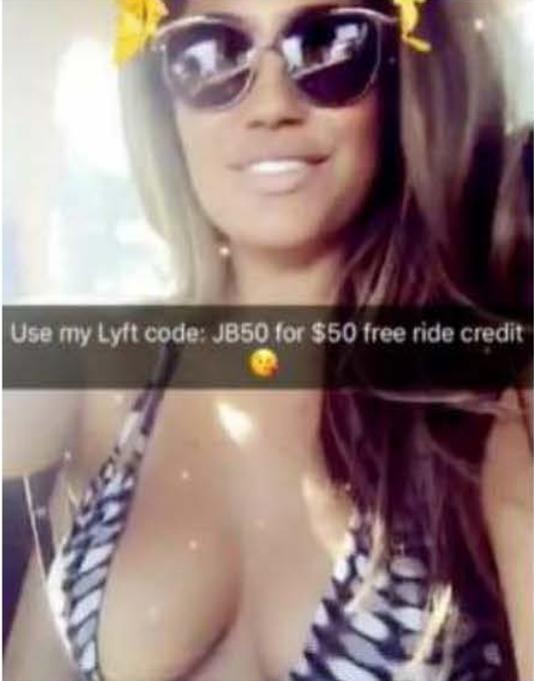
♡ Add a comment... 3/4

45. Endorser: Jessica Burciaga

Brand: Lyft Vodka

Followers: 1.6m

<https://www.instagram.com/p/BLNj15DBDbh/?taken-by=jessicaburciaga&hl=en>



jessicaburciaga Follow

94.5k views · 3w

jessicaburciaga If you're going out tonight download LYFT app and use my code: JB50 for \$50 FREE ride credit 🍷🍷
SnapChat: Jess.Burciaga

view all 72 comments

roobsko_ I'm pretty sure lol
strompe_condones

goofymaniak25 Excuse me... your boob is about to pop out

ghost004 Titties are just outkk

barbie.marina.1 🍷 respect

sullyZone Love @jonathan_k16

e__nyc That titty is all in my face 🍷🍷
@ryk__4life

misterpryor35 @savannah.millar

vivaspedroff Quer rica negra

monica.xc @vernilee

dr_insanity Sweet Paol! :D Do you have

♥️ Add a comment... 898

46. Endorser: Scott Disick

Brand: Lyft

Followers: 18.4m

<https://www.instagram.com/p/BMpk8aeh5Gz/?taken-by=letthelordbewithyou&hl=en>



letthelordbewithyou Follow

77.4k likes · 2w

letthelordbewithyou I don't know what I'd do without Lyft... I use it so much that I'm thinking about just selling all my cars! 🍷 Probably not though. Try it out this weekend for free! Use my code LORD and you'll get \$50 ride credit ON ME! You can thank me later.

view all 530 comments

cristanfantasy My hero 🍷

BanklyDean @katebrenne (ber copy) 🍷

nerca_jg_ 🍷🍷🍷

freshroyalty 🍷

inspiration__js Follow @mrazias, follow millionairs_motivation12 Check out my page guys

dawsonmcspadden I wish he would post something other than lyft coupons

♥️ Add a comment... 630

47. Endorser: Scott Disick

Brand: Lyft

Followers: 18.3m

https://www.instagram.com/p/BK_itGGh3Rx/?taken-by=letthelordbewithyou

letthelordbewithyou [Follow](#)

54.8k likes 2w

letthelordbewithyou The weekend is finally here and the LORD is giving away \$50 in FREE @Lyft ride credits by using the code "SCOTT" for all new users. I'm also randomly choosing any 5 people and giving them \$100 in FREE Lyft credits by following these 3 easy steps:

1) Like: This Photo of Me
2) Tag at Least 5 Friends

view all 487 comments

abee5673 [@rb7na](#) بالجمعة القدر بالله ان يعطنا 50 دولار في اربعت ايام الاسبوع وهو لفرحة وندخل الموقع rb7na هاتك انت ايضا الكود من حرجل الاول الموقع له بمسئولية من حرجل واسبعة الريح كثيرا واسطر اول rb7na انا جيتت اليكم الشتر من حرجل موقع rb7na بصلك معانا حتى التمرن

evon_latrail Go to Google, YouTube, Facebook, or Twitter and search, Evon Latrail

Add a comment...

48. Endorser: Amber Rose

Brand: Lyft

Followers: 12.6m

<https://www.instagram.com/p/BLmJL51DSz-/?taken-by=amberrose&hl=en>

Need a Lyft?

Download Lyft use code AMBER for \$50 in FREE credit today.

amberrose [Follow](#)

14.5k likes 3d

amberrose Grab your \$50 in FREE Lyft ride credit in order to get to your party safely. Download the @Lyft app anytime and use the code "AMBER" and don't forget to tag a friend who is going out with you this weekend. #TeamMuvu #PartySafety

view all 101 comments

princealaddinusa Uber bitch

Add a comment...

49. Endorser: Chelsea Houska

Brand: Datebox

Followers: 3.9m

<https://www.instagram.com/p/BLzKD8TBK92/?taken-by=chelseahouska>

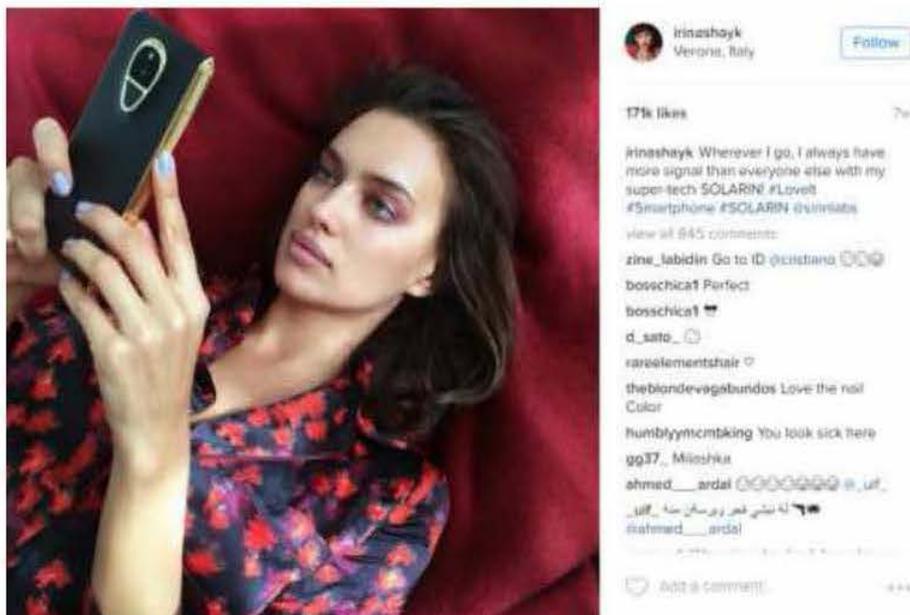


50. Endorser: Irina Shayk

Brand: Sirin Labs

Followers: 6.8m

<https://www.instagram.com/p/BKnnCSMh2zy/?taken-by=irinashayk>



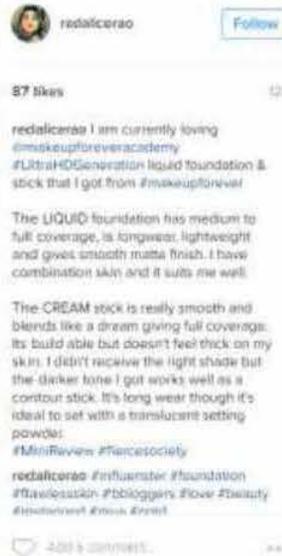
Appendix B

Endorser: redalicerao

Brand: Make Up For Ever through Influenster

Followers: 18.6k

<https://www.instagram.com/p/BMyTH4iBelG/?tagged=influenster&hl=en>

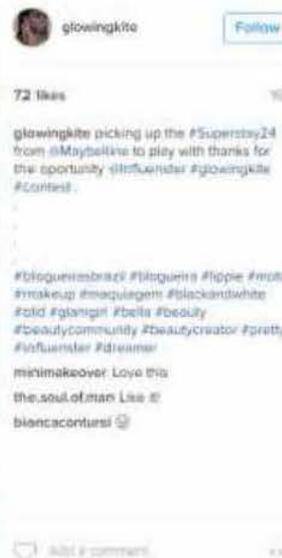


Endorser: glowingkite

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/BMwznPGj85E/?tagged=influenster&hl=en>



 jensvanity [Follow](#)

13 likes

jensvanity @influenster @LancomeOfficial #LookMainMyLashes #contest

The Lancome Definicis High Definition Mascara gives a natural but long and soft feeling lash. I really like it. The brush just grasps the lashes and the formula is perfect for layering. Thanks @influenster for sending this to try.

#vanity #youtube #makeup #makeupaddict #makeuplover #makeupjunkie #studyc #beautyblogger #bloggers #makeupandmakeup #makeupclose #freshyourface #makebeauty #makeupsoon #makeupfever #lovemakeup #beautyreposts #psys

 Add a comment... 

Endorser: Ashley Richardson

Brand: Bite Beauty through Influenster

Followers: 671

<https://www.instagram.com/p/BMwVWPTASLa/?tagged=influenster&hl=en>



 ashleyerichardson [Follow](#)

72 likes

ashleyerichardson I've been loving matte lipsticks this fall and these lip crayons from @bitebeauty are perfect! This color (glacé) is easily my favorite color ever. @influenster #themattecremelip #contest

ashleyerichardson

#blogger #instablogger #beautyblogger #makeupblogger #makeuplook #influenster #makeup #photosinbetween #love #matte lipstick #everydaymakeup #brillifeiscolorful #darlingmakeup #stylebeekah #livecolorfully #makeupstyle #thatsdarling #darlingsmovement #mybeautifulness #pursuepretty #instagood #instablogger #lifeandreaactions #luvstyle

thegirlfromnyc You're gorgeous

 Add a comment... 

Endorser: soemmasays

Brand: Nescafe through Bzzagent

Followers: 672

<https://www.instagram.com/p/BMzPXsWg0L-/?tagged=bzzagent&hl=en>



14 likes

soemmasays Trying out the new improved Nescafe Original Coffee ☘️ #gotitfree #nescafe #coffee #coffeetime #mondays #bzzagent

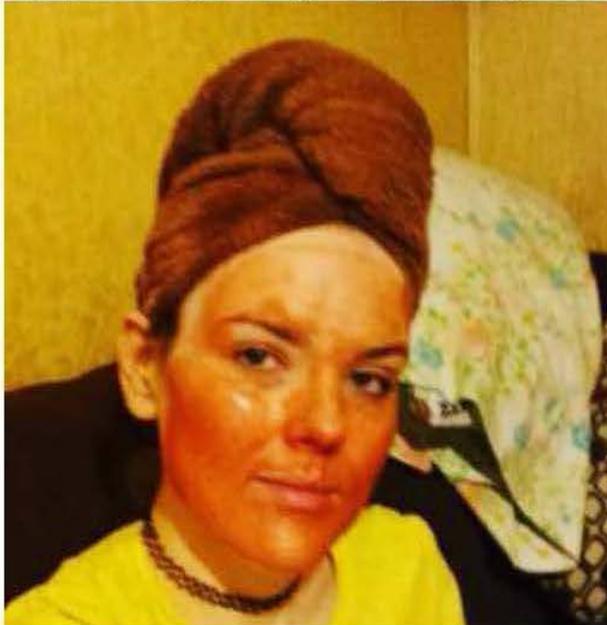
Add a comment...

Endorser: soemmasays

Brand: Nescafe through Bzzagent

Followers: 350

<https://www.instagram.com/p/BMsxiAvhv3Y/?tagged=bzzagent&hl=en>



samcclees, kelly48647, seubasicaofficial, product_photografy, laurieann14, michasiotrisonerna, silzabethvov1, cosminbanaura, michellescomments and thrifnymamashomestead like this

sjbutterfie I just love the new L'Oréal Pure Clay Masks I received from BzzAgent. I'm using the Exfoliate and Refine mask in the picture. The red algae mask is amazing. No more dry patches on my skin after using this mask. My face is so soft and now I can apply my makeup effortlessly without any visible dry patches. I've alternating the masks every week to try each one. So far I've tried all three and love them. The best part they don't break me out at all. #gotitfree #bzzagent #bzz #loreal #pureclaymasks

Add a comment...