





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 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. 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 ¹¹ 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. 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. 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 noncompliance 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

Robert Warnin

Kristen, Strader

Kristen Strader

Campaign Coordinator, Commercial Alert

Josh Golin

Executive Director, Campaign for a Commercial-Free Childhood

(KS)

Jeffrey Chester

Jeffrey Charte

Executive Director, Center for Digital Democracy

Sources

¹ Frier S and Townsend M (201

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

Tabl	e of	Cont	tents

Fashion	Images 1-18
Beauty Products	Images 19-47
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/BILmNQ9hI5d/?taken-by=farrah__abraham&hl=en



2. Endorser: Scott Disick Brand: Lord Time Pieces

Source: https://instagram.com/p/BIiDwhkgxrY/



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=itsjuliebowen&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/BFXawC1Qut-/?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/BFo5JlWJc1w/?taken-by=lindsaylohan&hl=en



13. Endorser: Troian Bellisario **Brand:** Matisse Footwear and Understated Leather **Source:** https://www.instagram.com/p/BGSRIpCGr2p/?taken-by=sleepinthegardn&hl=en



14. Endorser: Sofia Vergara Brand: Dana Rebecca Designs

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



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



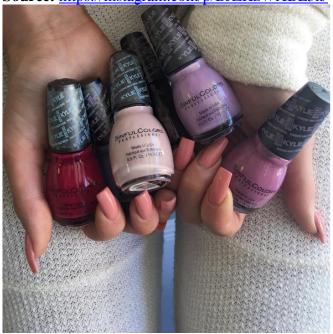
2: Beauty Products

19. Endorser: Isabel Sanz Brand: NYX Cosmetics

Source: https://www.instagram.com/p/BJQORirD_KO/?taken-by=isabel_sanzz



20. Endorser: Kylie Jenner **Brand**: SinfulColors **Source**: https://instagram.com/p/BJZKzWXBL5k/





21. Endorser: Scott Disick Brand: Pearly Whites Australia

Source: https://instagram.com/p/BHVFbX0h0kG/



22. Endorser: Meghan King Edmonds Brand: FabFitFun

Source: 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



24. Endorser: Marina Ruy Barbosa Brand: Pantene Brasil

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



25. Endorser: Lisa Rinna Brand: ToGoSpa

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



26. Endorser: Ashley Tisdale Brande: Laque Nail Bar

Source: https://instagram.com/p/BIv70EAgyPw/



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

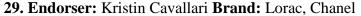
Source: https://instagram.com/p/BIIcL8VjJ1O/



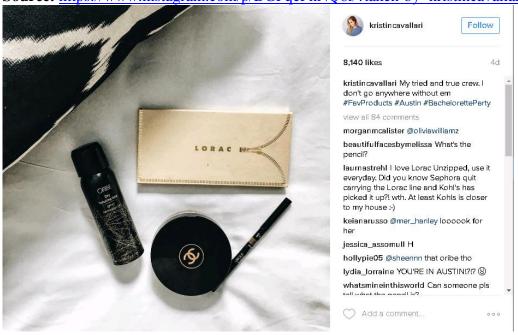
28. Endorser: Maisie Williams Brand: Olive and June

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





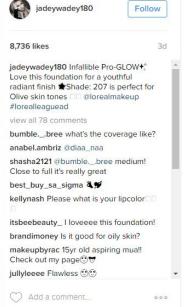
Source: https://www.instagram.com/p/BGPqePkNQ6i/?taken-by=kristincavallari



30. Endorser: Jade Marie Brand: L'Oreal

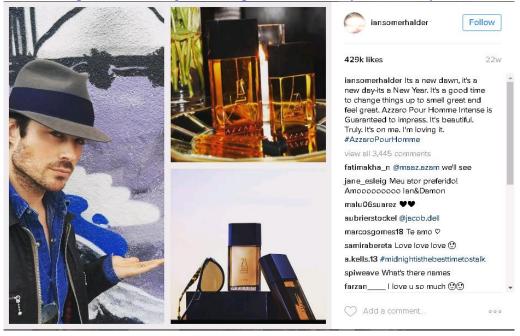






31. Endorser: Ian Somerhalder Brand: Azzaro Pour Homme

Source: https://www.instagram.com/p/BABLVYHKJyX/?taken-by=iansomerhalder



32. Endorser: Blake Lively Brand: L'Oreal

Source: 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



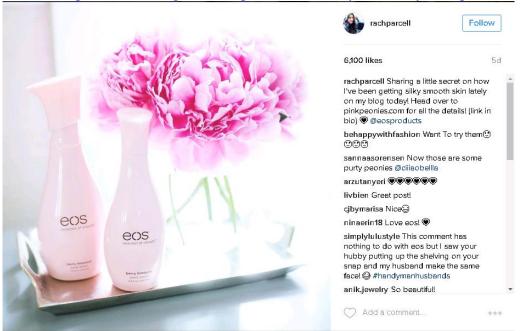
34. Endorser: Victoria Justice Brand: Simple Skincare

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



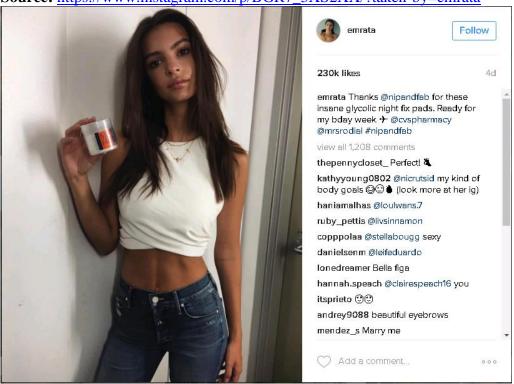
35. Endorser: Rach Parcell **Brand:** eos Products

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=behatiprinsloo



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/BIbh-rYA62I/?tagged=lorealleaguead



40. Endorser: Vanessa Hudgens **Brand:** Illuminate Cosmetics

Source: https://www.instagram.com/p/BGIpHP1zCs8/?taken-by=vanessahudgens



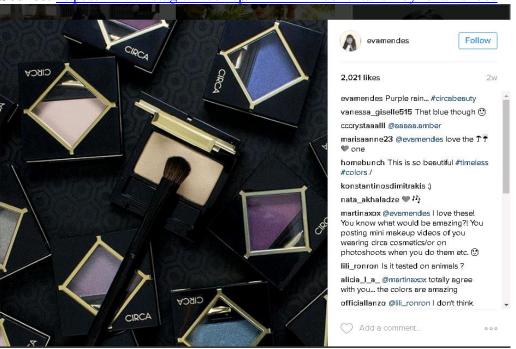
41. Endorser: Chelsea Houska Brand: SugarBearHair

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



44. Endorser: Danielle Peazer Brand: L'Oreal

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



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

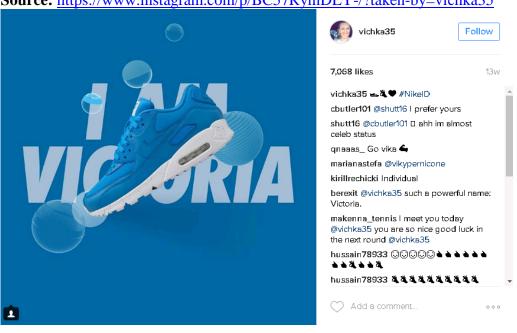
Source: https://www.instagram.com/p/BI63EM8gN1I/?taken-by=officialstephpratt



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

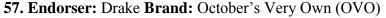
Source: https://www.instagram.com/p/BGEpbv1RFEH/?taken-by=garethbale11



56. Endorser: Stephen Curry Brand: Coach Up

Source: https://www.instagram.com/p/BDhB4QHzfex/?taken-by=stephencurry30





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



62. Endorser: Marcelo Brand: Adidas

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



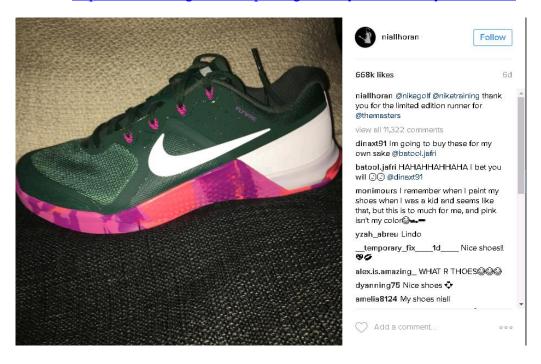
63. Endorser: Rickie Fowler **Brand:** Puma

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



64. Endorser: Niall Horan Brand: Nike

Source: https://www.instagram.com/p/BFzgM1EMyOz/?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

Follow



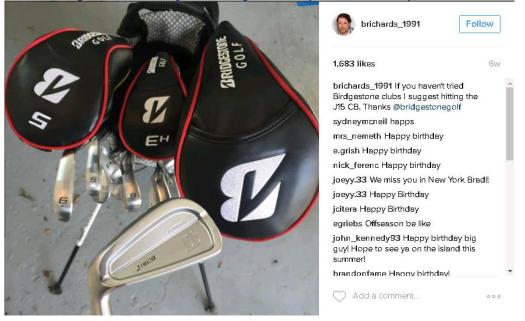
67. Endorser: Floyd Mayweather Brand: SubZero Recovery

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



68. Endorser: Brad Richards Brand: Bridgestone Sports

Source: https://www.instagram.com/p/BE6131yEse1/?taken-by=brichards_1991



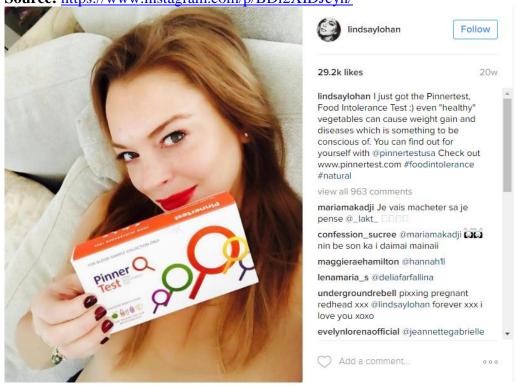
4:Food and Beverage

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/BDl2XIDJcyn/



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



74. Endorser: Nicole "Snooki" Polizzi **Brand:** Flat Tummy Tea **Source:** https://www.instagram.com/p/BGajsY8Bjrb/?taken-by=snookinic



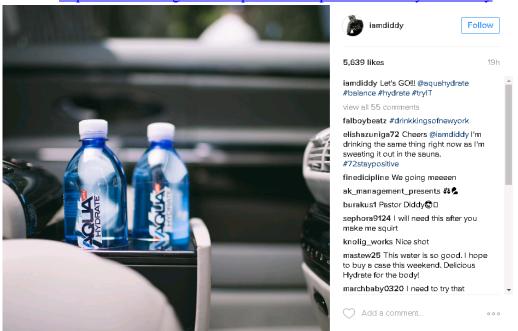
75. Endorser: Shay Mitchell Brand: Nettle Brand

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/BF6d0zOo5lm/?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



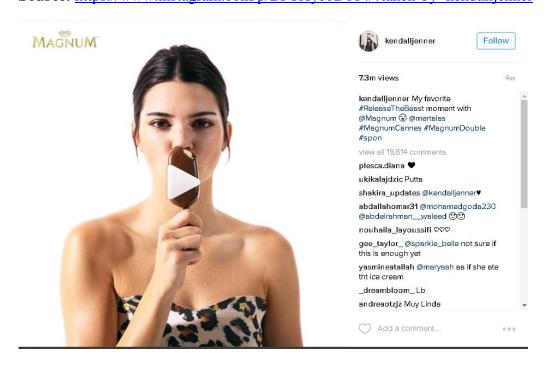
85. Endorser: Kevin Durant **Brand:** Sparkling Ice

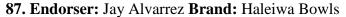
Source: https://www.instagram.com/p/_R1mBZzSk8/?taken-by=easymoneysniper



86. Endorser: Kendall Jenner Brand: Magnum

Source: https://www.instagram.com/p/BFTXyc0Do14/?taken-by=kendalljenner





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



88. Endorser: James Harrison Brand: Optimum EFX

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



89. Endorser: Heidi Klum Brand: Dunkin' Donuts

Source: https://www.instagram.com/p/BExH1NZD1dW/?taken-by=heidiklum



90. Endorser: Gabrielle Union Brand: Moet

Source: https://www.instagram.com/p/BDtJXyvJ-Ts/?taken-by=gabunion



91. Endorser: Chris Pratt Brand: Caveman Coffee



92. Endorser: Caroline Manzo Brand: HelloFresh US

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



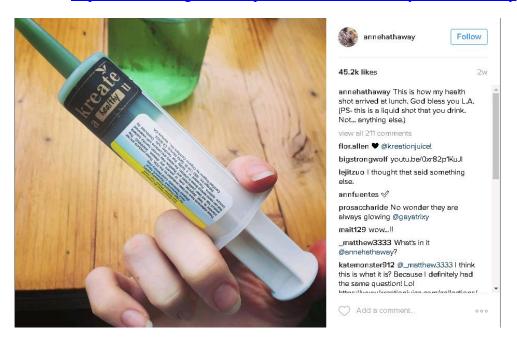
93. Endorser: Brody Jenner Brand: Lay's

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



94. Endorser: Anne Hathaway Brand: Kreation Organic

Source: https://www.instagram.com/p/BFmzS2ll0Ii/?taken-by=annehathaway



95. Endorser: Akon Brand: Vodka Beluga

Source: https://www.instagram.com/p/BEwy4kDFsD0/?taken-by=akon



96. Endorser: 50 Cent Brand: Effen Vodka

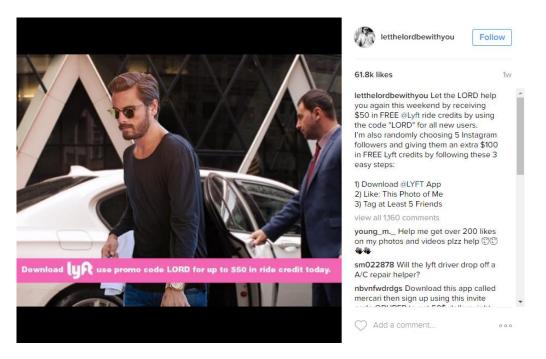
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5: OTHER

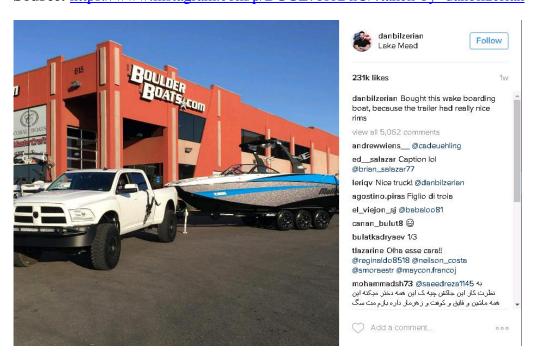
97. Endorser: Scott Disick Brand: Lyft

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



98. Endorser: Dan Bilzerian Brand: Boulder Boats

Source: https://www.instagram.com/p/BGGE7bfoDnU/?taken-by=danbilzerian

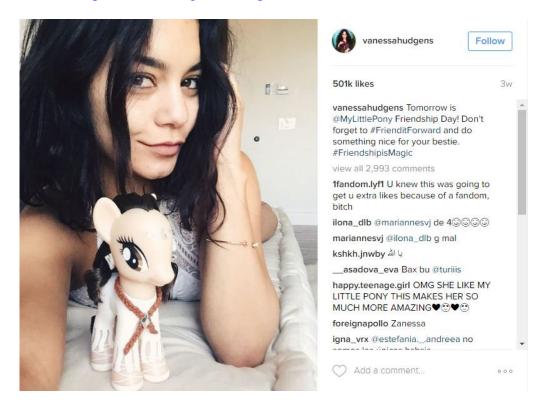


99. Endorser: Liam Payne **Brand:** Marvel

Source: https://www.instagram.com/p/sT6Larg1R5/?taken-by=liampayne



100. Endorser: Vanessa Hudgens **Brand:** My Little Pony **Source:** https://www.instagram.com/p/BIdKwYYhEIL/



101. Endorser: Gigi Hadid Brand: BMW

Source: https://www.instagram.com/p/BEL_hoZjCer/?taken-by=gigihadid



102. Endorser: Neymar Brand: Airbnb

Source: https://www.instagram.com/p/BGNhOXaxttY/?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/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/BAVg0A4IvXX/?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/8mIhWjicuw/?taken-by=theofficialai3



113. Endorser: Demi Lovato Brand: Honda

Source: https://www.instagram.com/p/BEZxLLnuKoH/?taken-by=ddlovato

