June 26, 2017

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

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

Dear Mr. Pahl and Ms. Engle,

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

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

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

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

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

Evidence of Serial Non-Compliance

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

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

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

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

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

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

**Requested Action**

Given the pervasiveness and reach of nondisclosed influencer advertising on Instagram, we request that the FTC bring enforcement actions and seek penalties for posting nondisclosed sponsored content, especially for influencers and brands that are repeat offenders. The FTC must demonstrate that there will be consequences for failure to follow the FTC’s guidelines. While the onus of responsibility falls on marketers, the FTC should also work directly with influencers to acknowledge their noncompliance and set a precedent in order to change influencer behavior in the long term.
Additionally, the FTC should work with Instagram to develop a system that makes it easy to denote paid posts consistent with FTC guidelines. Instagram has recently adopted an advertising post identification system, but it needs to be refashioned to do the job of protecting consumers from deceptive, hidden ads. Instagram could create an option that allows influencers to select “paid post” when posting a photo. This could then automatically put a red box around the photo with the word “advertisement” at the top of the photo. When the image appears on users’ newsfeeds, it will be clearly labelled as an advertisement. Even users who do not read the entirety of every caption will be alerted that what they are seeing is an advertisement. Working with Instagram could provide a long-term and uniform solution.

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

We are happy to meet to discuss these matters further.

Sincerely,

Robert Weissman
President, Public Citizen

Kristen Strader
Campaign Coordinator, Commercial Alert

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

Jeffrey Chester
Executive Director, Center for Digital Democracy
Sources


5 See Appendix A


Appendix A

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

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Total posts: 412

Undisclosed posts: 327

Disclosed posts: 85
Appendix B

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

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

2. **Endorser: Jen Selter**  
   **Brand: Gym Looks**  
   **Followers: 11.4m**
3. **Endorser:** Sean Combs  
**Brand:** DeLeon Tequila  
**Followers:** 8.2m

4. **Endorser:** Shay Mitchell  
**Brand:** Epic Road  
**Followers:** 17.2m
5. Endorser: Ciara  
Brand: Jon Buscemi  
Followers: 16.6m

6. Endorser: Dorothy Wang  
Brand: Lift MD  
Followers: 985k
**Brand: Farm Tour**  
Followers: 3.7m

8. **Endorser: Lucy Hale**  
**Brand: Veuve Clicquot**  
Followers: 18.5m
9. Endorser: Naomi Campbell  
Brand: Globe Trotter  
Followers: 4.2m

10. Endorser: Giuliana Rancic  
Brand: G by Giuliana  
Followers: 2.7m
11. Endorser: Sofia Vergara
Brand: Sofia Vergara Perfume, Perfumania
Followers: 12.8m

12. Endorser: Heidi Klum
Brand: Rankin
Followers: 3.7m
13. Endorser: Rach Parcell
   Brand: Rachel Parcell clothing
   Followers: 927k

14. Endorser: Jenni Farley
   Brand: Australian Gold
   Followers: 5.2m
15. Endorser: Jamie Lynn Spears  
Brand: Monster Energy  
Followers: 1.4m

16. Endorser: Maci DeShane Bookout  
Brand: TTM Lifestyle  
Followers: 3.7m
17. **Endorser: Tiona Fernan**  
**Brand:** Sneaky Vaunt  
**Followers:** 446k

18. **Endorser: Nicole Polizzi**  
**Brand:** STK, The ONE Group  
**Followers:** 10.3m
19. Endorser: Amber Rose
   Brand: Flirt Cosmetics
   Followers: 15.2m

20. Endorser: Vanessa Hudgens
    Brand: Whispering Angel
    Followers: 26.1m
21. Endorser: Valentina Vignali  
Brand: Women’s Best  
Followers: 975k

22. Endorser: Lilly Ghalichi  
Brand: Ryan and Walter  
Followers: 2.7m
23. Endorser: Behati Prinsloo
Brand: Juicy Couture
Followers: 5.1m

24. Endorser: Anna Petrosian
Brand: Ice Link, Converse
Followers: 1.5m
Endorser: Troian Bellisario
Brand: Ritual Cosmetics
Followers: 10.1m

Endorser: Nina Agdal
Brand: G.H. Mumm
Followers: 1.6m
28. Endorser: Ashley Benson  
   Brand: Prive Revaux  
   Followers: 16.9m

29. Endorser: Emily Ratajkowski  
   Brand: Marc Jacobs  
   Followers: 13.5m
30. Endorser: Denice Moberg  
Brand: GymShark  
Followers: 716k

31. Endorser: Scott Disick  
Brand: Jet Lux Life  
Followers: 20m
32. Endorser: Lindsay Lohan  
Brand: SSH Maritime  
Followers: 6.1m

33. Endorser: Bella Thorne  
Brand: Dolls Kill  
Followers: 15.7m
34. Endorser: Sophia Bush  
Brand: Listerine  
Followers: 2.9m

35. Endorser: Zendaya  
Brand: Jet Lux Life  
Followers: 42.3m
36. Endorser: Massy Arias  
   Brand: Listerine  
   Followers: 2.2m

37. Endorser: Farrah Abraham  
   Brand: Beverly Hills Rejuvenation Center  
   Followers: 918k
38. Endorser: Akon  
Brand: Ratel Geneve  
Followers: 3.2m

39. Endorser: Jennifer Lopez  
Brand: Valentino, Harry Winston  
Followers: 66.5m
40. Endorser: Vanessa Lachey  
Brand: The Home Edit  
Followers: 561k

41. Endorser: Victoria Beckham  
Brand: Estee Lauder, Victoria Beckham  
Followers: 16m
42. Endorser: Lisa Rinna  
Brand: Teami Blends  
Followers: 1.1m

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

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

Endorser: Chelsea Houska  
Brand: Loved by Hannah and Eli Incorporated  
Followers: 4.6m
Appendix C
All undisclosed posts made by influencers after receiving the FTC’s letter:

1. Nicky Jam:
https://www.instagram.com/p/BT2yrrjQyf/
https://www.instagram.com/p/BTpeLIUj869/?taken-by=nickyjampr
https://www.instagram.com/p/BUJ3olJj8ce/

2. Jen Selter:
https://www.instagram.com/p/BUsUpaZhv3k/?taken-by=jenselter
https://www.instagram.com/p/BUihUXBBtFO/?taken-by=jenselter
https://www.instagram.com/p/BVFaGMRBAIZ/?taken-by=jenselter
https://www.instagram.com/p/BVdzL_Khrw4/?taken-by=jenselter

3. Sean Combs:
https://www.instagram.com/p/BTnQDuwjz1/?taken-by=diddy
https://www.instagram.com/p/BTpRQl6DAJp/?taken-by=diddy
https://www.instagram.com/p/BTzQ1gD6yc/?taken-by=diddy
https://www.instagram.com/p/BTt3GXEDlnY/?taken-by=diddy
https://www.instagram.com/p/BTuG7eLj-hN/?taken-by=diddy
https://www.instagram.com/p/BTuPvohD6Lh/?taken-by=diddy
9. Caroline Manzo:
https://www.instagram.com/p/BURnQ2_D8U1/?taken-by=carolinemanzo&hl=en

10. Lucy Hale:
https://www.instagram.com/p/BUpOcYIFWrJ/?taken-by=lucyhale&hl=en
https://www.instagram.com/p/BTo0LORF9Fs/?hl=en&taken-by=lucyhale
https://www.instagram.com/p/BU1qddwl1PW/?taken-by=lucyhale&hl=en
https://www.instagram.com/p/BU4X_LslS86/?taken-by=lucyhale&hl=en

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

12. Giuliana Rancic:
https://www.instagram.com/p/BT2hzceF527/?taken-by=giulianarancic&hl=en
https://www.instagram.com/p/BUsz5oGlyQ7/?taken-by=giulianarancic&hl=en
https://www.instagram.com/p/BU1z3aclL2Z/?taken-by=giulianarancic&hl=en
https://www.instagram.com/p/BVOZB4qlT_S/?taken-by=giulianarancic&hl=en

13. Sofia Vergara:
https://www.instagram.com/p/BTr2lCcF4qG/?taken-by=sofiavergara&hl=en
https://www.instagram.com/p/BTsKg0blGuo/?taken-by=sofiavergara&hl=en
https://www.instagram.com/p/BTsZPwTFzJa/?taken-by=sofiavergara&hl=en
https://www.instagram.com/p/BTsf-4Nl8MZ/?taken-by=sofiavergara&hl=en
https://www.instagram.com/p/BTsn2nZlFRs/?taken-by=sofiavergara&hl=en
https://www.instagram.com/p/BTw6tUalUAm/?taken-by=sofiavergara&hl=en

14. Heidi Klum:
https://www.instagram.com/p/BUmZ1GAgrZt/?taken-by=heidiklum&hl=en
https://www.instagram.com/p/BVAqPDWg0iD/?taken-by=heidiklum&hl=en

15. Rachel Parcell:
https://www.instagram.com/p/BTk5UC9FZbb/?taken-by=rachparcell&hl=en
https://www.instagram.com/p/BTmbwdXlqYV/?taken-by=rachparcell&hl=en
https://www.instagram.com/p/BTkHVallEv/?taken-by=rachparcell&hl=en
https://www.instagram.com/p/BTo46k3Fpxv/?hl=en&taken-by=rachparcell
https://www.instagram.com/p/BTqOApIlpuh/?taken-by=rachparcell&hl=en
https://www.instagram.com/p/BTrxPdwldGD/?taken-by=rachparcell&hl=en
https://www.instagram.com/p/BTw6tUalUAm/?taken-by=rachparcell&hl=en
16. Jenni Farley:
https://www.instagram.com/p/BTjnbmSjLFr/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BTo6aTXDx6J/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BTrSY7DDg3I/?taken-by=jwoww&hl=en
https://www.instagram.com/p/Byd84gjI3Jd/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BT4C24mjDI7/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BT645sqjs6j/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUC_rM-Dx03/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUKWWLNjxGd/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUPLSv8DThv/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUW9yR9De2v/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUxrc0BjOfu/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUZIRzVjmLP/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BT-OS4JDA0B/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUc-AmMDjQ5/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUkWsEZD7KO/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUuC5xMjouw/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUuahlfK9A/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BU/wTSIWDBnx/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BUwplJDOO3/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BU1rfQLDB33/?taken-by=jwoww&hl=en
https://www.instagram.com/p/BU2ZquGjGU8/?hl=en&taken-by=jwoww
https://www.instagram.com/p/BUZIRzVjmLP/?hl=en
https://www.instagram.com/p/BU1rfQLDB33/?taken-by=jwoww&hl=en

17. Jamie Lynn Spears:
https://www.instagram.com/p/BT2IjcWD-30/?taken-by=jamielynnspears&hl=en
https://www.instagram.com/p/BUScxLyjMuA/?taken-by=jamielynnspears&hl=en

18. Maci Bookout:
https://www.instagram.com/p/BTrOTUpDhgj/?taken-by=macideshanebookout&hl=en
https://www.instagram.com/p/BULQXaJDjd8/?taken-by=macideshanebookout&hl=en
https://www.instagram.com/p/BUqJmPujpqA/?taken-by=macideshanebookout&hl=en

19. Tiona Fernan:
https://www.instagram.com/p/BTpgO1TFcdx/?hl=en&taken-by=xttiona
https://www.instagram.com/p/BTslSHnlOMP/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BTxActtF33y/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BTzVHoiligg/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BTzsYpfFMMW/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BTztKsIFUZq/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BU2D9pFvkM/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BU6wu5kl_V_/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUAmYbOFz67/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUK33YyFMde/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUKjX-XI6qc/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUM32kaFoMa/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUdBP0jlDHE/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUfxSsRlpE7/?taken-by=xttiona&hl=en
https://www.instagram.com/p/BUmp7Cflqi?taken-by=xttiona&hl=en
20. Nicole Polizzi:
https://www.instagram.com/p/BTkCGFgBDRy/?taken-by=snooki&hl=en
https://www.instagram.com/p/BVESc5ZBV9z/?taken-by=snooki&hl=en

21. Amber Rose:
https://www.instagram.com/p/BU5F8ooBYgY/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BT7Rv8mDaLK/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUAFlKZhvOj/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUKzPOKhSGO/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUh6g0FhtSG/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUKm55Bmph/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUwmQ4QBuCW/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUz3POKhSGO/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BUwwA15BbMb/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BVFguUmBdXD/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BVFoWoCh6At/?taken-by=amberrose&hl=en
https://www.instagram.com/p/BVGR8Puhpsh/?taken-by=amberrose&hl=en

22. Vanessa Hudgens:
https://www.instagram.com/p/BUpUfsDaE4/?taken-by=vanessahudgens&hl=en

23. Valentina Vignali:
https://www.instagram.com/p/BTjFWC1A5WV/?taken-by=valentinavignali
https://www.instagram.com/p/BTji1iejAYK/?taken-by=valentinavignali
https://www.instagram.com/p/BTlqIl8Av8l/?taken-by=valentinavignali
https://www.instagram.com/p/BToQ-DVA1Rf/?taken-by=valentinavignali
https://www.instagram.com/p/BTo9sFKgtz9/?taken-by=valentinavignali
https://www.instagram.com/p/BtYMAFAnsli/?taken-by=valentinavignali
https://www.instagram.com/p/BTyiE_OgMFri/?taken-by=valentinavignali
https://www.instagram.com/p/BT1HUVOAAe4/?taken-by=valentinavignali
24. Lilly Ghalichi:
https://www.instagram.com/p/BTls6Hglcg3/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTmTDBYFu8F/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTw3lmGFp3K/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTxZkXnFhpG/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTvbbGlfdI/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTz70hAUU1/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTz2vK-ItpB/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT0MHHR6ldVF/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BTzl36fIR3z/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT2CwThFrBZ/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT2IOAMIKNB/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT2ewtkFyqL/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT2rvfplPr3/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT4hVFnFklu/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT6059t6hQ/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT7mvdlBBt/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT8KsvPF7v8/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BT9do8nF1cp/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BUAaSCol7dN/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BUAgAUlHbdE/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BUhgX6Ffe1/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BU0gJJIl6K9/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BU3lhJ-F3TT/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BU7K0wWFGYt/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BU7gjklrMi/?taken-by=lillyghalichi&hl=en
https://www.instagram.com/p/BU-AMNOFW2d/?taken-by=lillyghalichi&hl=en
25. Behati Prinsloo:
https://www.instagram.com/p/BTraumqAfgh/?taken-by=behatiprinsloo&hl=en
https://www.instagram.com/p/BUAkP08gehp/?taken-by=behatiprinsloo&hl=en

26. Anna Petrosian:
https://www.instagram.com/p/BUNnqzYhmJl/?taken-by=annapetrosian&hl=en
https://www.instagram.com/p/BVN1eXyBF4P/?hl=en&taken-by=annapetrosian

27. Troian Bellasario:
https://www.instagram.com/p/BTkBarUhirq/?taken-by=sleepinthegardn&hl=en
https://www.instagram.com/p/BUCDb07BWYu/?taken-by=sleepinthegardn&hl=en

28. Nina Agdal:
https://www.instagram.com/p/BTzhdhPAQ7T/?hl=en

29. Ashley Benson:
https://www.instagram.com/p/BT6tw5PDBEs/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BTpYKTjtuD/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/89KymDFDfou/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BUNqmn0jrT/?hl=en&taken-by=ashleybenson
https://www.instagram.com/p/BUd3KYoDrVn/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BUkS5w91VYV/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BUmqAmDjryA/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BU0hCJukG/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BU2JUHDSBZ/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BVJQfDnable/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BVAXADDo3O/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BVFTT7iOD5C/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BVF03XUDQUk/?taken-by=ashleybenson&hl=en
https://www.instagram.com/p/BUsoD9tbqO/?taken-by=ashleybenson
https://www.instagram.com/p/BUhTDVvDNuy/?taken-by=ashleybenson

30. Emily Ratajkowski:
https://www.instagram.com/p/BTmCg6yFhUf/?taken-by=emrata&hl=en

31. Denice Moberg:
https://www.instagram.com/p/BTuGF4hBF-S/?taken-by=deniceemoberg&hl=en
https://www.instagram.com/p/BT18UaLBp4_/?taken-by=deniceemoberg&hl=en
https://www.instagram.com/p/BUKkGBjB7U6/?taken-by=deniceemoberg&hl=en
https://www.instagram.com/p/BUMq4ABh-N/?taken-by=deniceemoberg&hl=en
https://www.instagram.com/p/BUNDIAwbbiG/?taken-by=deniceemoberg&hl=en
32. Scott Disick:
https://www.instagram.com/p/BUODSBVhRCX/?hl=en&taken-by=letthelordbewithyou
https://www.instagram.com/p/BV02_2BAsC/?taken-by=letthelordbewithyou&hl=en
https://www.instagram.com/p/BV032JigSYp/?taken-by=bellathorne

33. Lindsay Lohan:
https://www.instagram.com/p/BUR8Ga_g9CR/?taken-by=lindsaylohan&hl=en
https://www.instagram.com/p/BUVgBAnH2x/?taken-by=lindsaylohan&hl=en
https://www.instagram.com/p/BUX5316gKlQ/?taken-by=lindsaylohan&hl=en
https://www.instagram.com/p/BUdDMJogVU/?taken-by=lindsaylohan&hl=en

34. Bella Thorne:
https://www.instagram.com/p/BUCzLQtAnf4/?taken-by=bellathorne&hl=en
https://www.instagram.com/p/BTzhkJpSYp/?hl=en&taken-by=bellathorne

35. Zendaya:
https://www.instagram.com/p/BT0YOwJhcEz/?taken-by=Zendaya &hl=en
https://www.instagram.com/p/BUHyvKhWnK/?taken-by=Zendaya &hl=en

36. Sophia Bush:
https://www.instagram.com/p/BT7DD43DoyK/?taken-by=sophiabush&hl=en
https://www.instagram.com/p/BUd6Tg6D0IP/?hl=en&taken-by=sophiabush
https://www.instagram.com/p/BUc8LWMDNxs/?hl=en&taken-by=sophiabush

37. Massy Arias:
https://www.instagram.com/p/BVFKNFEAcoi/?taken-by=massy.arias&hl=en

38. Farrah Abraham:
https://www.instagram.com/p/BTiTRIAmPM/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTmpt7GgJel/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTrO7_agFR7/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BT8nHA6sGg/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTvcLpAR8q/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BTviXyIA-kv/?taken-by=farrah_abraham&hl=en
https://www.instagram.com/p/BUGL1wnAsUH/?taken-by=farrah_abraham&hl=en
39. Lisa Rinna:
https://www.instagram.com/p/BU6yu0ZAzOL/?taken-by=farrah__abraham&hl=en
https://www.instagram.com/p/BU6zlREgFWe/?taken-by=farrah__abraham&hl=en
https://www.instagram.com/p/BU6zIReGFWe/?taken-by=farrah__abraham&hl=en

40. Akon:
https://www.instagram.com/p/BUJY57IF8dL/?hl=en&taken-by=akon
https://www.instagram.com/p/BUJY57IF8dL/?hl=en&taken-by=akon
https://www.instagram.com/p/BUJY57IF8dL/?hl=en&taken-by=akon

41. Jennifer Lopez:
https://www.instagram.com/p/BTkTW6dlZ0W/?taken-by=jlo&hl=en
https://www.instagram.com/p/BTkTW6dlZ0W/?taken-by=jlo&hl=en

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

43. Victoria Beckham:
https://www.instagram.com/p/BTwvuYahCL8/?taken-by=victoriabeckham&hl=en
5 See Appendix A