Influencer Marketing & Consumer Harm
Alcohol, E-Cigs, & Cryptocurrency
Who is truthinadvertising.org?

TINA.org’s Mission
Dedicated to empowering consumers to protect themselves from false and misleading advertising

What We Have Done
Over 4,000 Ad Alerts, News Stories, Blogs, and Class Action Tracker Posts; More than 100 Legal Actions

How We Do It
Investigative Journalism, Education, Legal Advocacy

Where to Find Us
www.truthinadvertising.org or www.TINA.org @truthinad on Twitter /truthinad on FB
TINA.org Investigations

CALIFORNIA

GOOP
Unsubstantiated Health Claims

NEW YORK

DealDash
Deceptive Marketing & Illegal Gambling

CONNECTICUT

Outlet Stores
Fictitious Pricing

FTC

Gillette
False Made in the USA Claims
Social Media Influencer Marketing

FAILURE TO DISCLOSE MATERIAL CONNECTIONS
Social Media Influencer Marketing

FAILURE TO DISCLOSE MATERIAL CONNECTIONS
Who is DJ Khaled?

INFLUENCER MARKETING
Typical Snapchat Story

• Compilation of videos and images

• Disappears after 24 hours
Who is DJ Khaled?

INFLUENCER MARKETING

Record Producer, DJ, “King of Snapchat”

23 million followers on social media
6 million followers on Snapchat
Snaps get 2+ million views each
TYPICAL Social Media Posts ACROSS PLATFORMS
djkhaled #SECUREDTHEMAJORBAGALERT #BILLIALERT !! Wow what amazing B DAY GIFT 🙌 to sign off on the renegotiation and continued Partnership of #DJKHALED #WETHEBEST @epicrecords

THANK YOU FOR SEEING MY VISON !!!
Legacy! That's what this picture is. Continuing the legacy of excellence with @wethebestmusic alongside the iconic @epicrecords @sonymusicglobal brand.

96,144 likes
November 26, 2017
Breakfast of Champions?

INFLUENCER MARKETING

Start your Tuesday off right! CIROC the only way!

Start your Wednesday off right! CIROC THE ONLY WAY!

Start your Thursday right CIROC the only way.

Start your Friday right! CIROC THE ONLY WAY.

#ciroc
Start your Monday right! @ciroc the only way! @diddy ... 🍸 make sure you do it responsibly!
“It’s Always That Time”

INFLUENCER MARKETING

Cookies and Ciroc

Slushy Style

djkhaled @ciroc and PON your head top 😋........ @ciroc vibes .. @diddy
JULY 23, 2017

djkhaled It’s always that time! @ciroc @officialbelaire vibes
SEPTEMBER 15, 2017
TINA.org Evidence
MORE THAN 350 EXAMPLES
March 29, 2018

VIA OVERNIGHT MAIL AND EMAIL

Alan Soven
Alan R. Soven, PA
1571 NW 13th Court
Miami, FL 33125

Robert S. Meloni
Meloni & McCaffrey
3 Columbus Circle, 15th Floor
New York, NY 10019

Re: Deceptive Advertising by DJ Khaled, Diageo, Bacardi, and Sovereign Brands

Dear Mr. Soven and Mr. Meloni:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), Public Citizen, Alcohol Justice, US Alcohol Policy Alliance, Campaign for a Commercial-Free Childhood, The Center for Digital Democracy, and Mothers Against Drunk Driving regarding problematic marketing that pertains to your client Khaled M. Khaled (aka DJ Khaled).
Khaled Updates Social Media

IN RESPONSE TO WARNING LETTER
CONGRATULATIONS
YOU PLAYED YOURSELF

Visit TINA.org for more information
Social Media Influencers

PROMOTING ALCOHOL
April 24, 2018

Submission Tracking Number (STN): RD0000476

JUUL Labs, Inc.
660 Alabama Street
2nd Floor
San Francisco, CA 94110

Dear Mr. Ziad Rouag:

Under Section 904(b) of the Federal Food, Drug, and Cosmetic Act (FD&C Act), FDA is requesting that JUUL Labs, Inc. (JUUL) submit documents relating to marketing practices and research on marketing, effects of product design, public health impact, and adverse experiences and complaints related to JUUL products. This request applies to research relating to all such tobacco products and their components or parts, including those products for research, investigational use, developmental studies, test marketing, and/or commercial marketing.

FDA is requesting these documents based on growing concern about the popularity of JUUL products among youth. JUUL product use appears to be common in middle and high schools based on widespread media reporting describing a rapid growth of use among youth in general and on school property, and numerous complaints that have been received by CTP, small research studies that have
JUUL product use appears to be common in middle and high schools. Widespread reports of youth use of JUUL products are of great public health concern and no child or teenager should ever use any tobacco product. Nicotine affects the developing brain and youth may not understand the nicotine or other characteristics of JUUL.
Affiliate Marketing

JUUL E-CIGARETTES

Complete Application

The technology for the JUUL Vapor affiliate campaign is provided by Impact. Please fill out this form to complete your application.

I am a New User  I am an Existing User

Company Information

Account Display Name

Enter your account display name (or your name if an individual).

Country

United States

Website

http://www.yourdomain.com

Promotional Methods

Primary Promotional Method

Select the top promotional method which you employ.

Secondary Promotional Methods

- Email
- Search Engine Marketing
- Loyalty/Rewards
- Coupon/Deals
- Syndication/Blog Networks
- CPA/Sub-Affiliate Networks
- Mobile
- Content
- Shopping/Comparison
- Social Media/Influencer
- Service Providers/Tools
- Consumer Software / Technology
- Incentivized
- Offline
- Other

Promoting Countries

United States

Add Another Country
Age-Gating

JUUL E-CIGARETTES
Nicotine Warning

JUUL E-CIGARETTES

WARNING: This product contains nicotine. Nicotine is an addictive chemical. #juul

#juulvapor #switchtojuul
phfern_ @juulvapor see the direct! 😃
cp1173 @mmorrison3 I thought this was you lol
taya.kathleen Make a Lavender Vanilla pod 😊
codeman513 Sell your pod eliquid too many refillable pod devices

1,007 likes
FEBRUARY 15

Add a comment...
Nicotine Warning: Mobile View

JUUL E-CIGARETTES

WARNING: This product contains nicotine. Nicotine is an addictive chemical. #juul #juulvapor #switchtojuul
Social Media Influencer Marketing

JUUL E-CIGARETTES

Social media influencers are often used to promote products, such as JUUL e-cigarettes.
SEC Halts Fraudulent Scheme Involving Unregistered ICO

FOR IMMEDIATE RELEASE
2018-53

Washington D.C., April 2, 2018 — The Securities and Exchange Commission today charged two co-founders of a purported financial services start-up with orchestrating a fraudulent initial coin offering (ICO) that raised more than $32 million from thousands of investors last year. Criminal authorities separately charged and arrested both defendants.

The SEC’s complaint alleges that Sohrab “Sam” Sharma and Robert Farkas, co-founders of Centra Tech. Inc., masterminded a fraudulent ICO in which Centra offered and sold unregistered investments through a “CTR Token.” Sharma and Farkas allegedly claimed that funds raised in the ICO would help build a suite of financial products. They claimed, for example, to offer a debit card backed by Visa and MasterCard that would allow users to instantly convert hard-to-spend cryptocurrencies into U.S. dollars or other legal tender. In reality, the SEC alleges, Centra had no relationships with Visa or MasterCard. The SEC also alleges that to promote the ICO, Sharma and Farkas created fictional executives with impressive biographies, posted false or misleading statements online and failed to disclose that they had previously been charged with criminal fraud.

The SEC seeks a permanent injunction, disgorgement and civil penalties.

Related Materials
- SEC Complaint
Social Media Influencer Marketing

CRYPTOCURRENCY

djkhaled: I just received my titanium centra debit card. The Centra Card & Centre Wallet app is the ultimate winner in Cryptocurrency debit cards powered by CTR tokens! Use your bitcoins, ethereum, and more cryptocurrencies in real-time across the globe. This is a Game changer here. Get your CTR tokens now! #CryptoBill #Bitcoin #Ethereum #Digitalcurrency

108,177 likes
Social Media Influencer Marketing

Alcohol

E-Cigarettes

Cryptocurrency