

Advertising

- Podcasts are a form of advertisement
- Avoid call to actions like “apply here”
- “Learn more” is important to have on all social posts to show that there is more information than just what is shown in the post
- Do not use scare tactics
- Do not create a false sense of urgency (ex. COVID)
- Do not speak poorly of a competitor
- Do not use a misleading title (ex. Senior Field Underwriter)

FTC Enforcement: Cease & Desists

- A video with the description "... We have been so blessed as 7-figure earners and we are here to help you, achieve your financial or time freedom goals,"

and the statements made in the video: "The timing for you to get involved with an online business is second to none guys... In the United States alone, 3.3 million people filed for unemployment last week alone. So, guess what? They're looking to make an extra \$200, \$300, \$400, \$500 part time right now... You have the ability to make money right away... There are so many people right now that are looking for something. That will be looking for something... We give them an opportunity to really have a better quality of life, however they want to define it. Whether it be an extra 50 bucks, an extra 500 bucks, an extra 5,000 bucks – they get to choose the quality of life that they want here."

FTC Enforcement: Cease & Desists

- “For those of you working from home now, who says you ever have to go back? With a little education and a lot of uplifting support... you can take your health and your career future into your own hands.”
- “Need to make extra money? Find it difficult to pay your bills? Were you laid off/ #fired? Be your own Boss. Msg me to achieve financial independence #laidoff #unemployed #cantpaymybills #cantpaymyrent #student #sales #sidehustle #makemoney #stayathomemom”

Notices of Penalty Offenses: Money Making Opportunities

- Examples:
 - Claims that a participant will earn \$X per week or a “substantial income”
 - Claims about “financial freedom” or “residual income”
 - Claims that an opportunity will “change your life”
 - Claims about unlimited success
 - Claims that you will learn from a millionaire/successful participant
 - Claims that leads or following a particular plan will lead to success
 - Suggestions that putting in the work/investing in leads is all you need to be successful
 - Images of cash or deposited checks
 - Implying that anyone can do this