

Do It Right

FTC Compliance Workbook

A practical workbook for affiliates, creators, brands, and digital marketers who want to follow FTC rules without guessing.

How to use this workbook

Read each module, complete the exercises in the spaces provided, and use the checklists before every campaign. The workbook mirrors the online course at Do It Right.

Disclaimer: This workbook is educational only and is not legal advice. Always consult a qualified attorney and check [FTC.gov](https://www.ftc.gov) for the latest guidance.

Module 1: Disclosures

Tell people the relationship before they click or buy.

If you have a material connection to a brand — money, free stuff, commissions, a discount code, equity, employment, or even a family tie — you must disclose it clearly and conspicuously. The test is simple: would a reasonable consumer know the relationship before acting on your recommendation?

Key rules

- Disclose before the affiliate link or recommendation, not buried at the end.
- Use plain language. #ad and 'partner' are usually clear; cryptic abbreviations are not.
- The disclosure must be easy to notice on the device and platform used.
- Gifts, discounts, store credit, travel, and free products count as compensation.
- Tagging a brand, using a commission link, or joining an affiliate program triggers the duty.

Do this, not that

Do this	Not that	Why
Put the disclosure in the first three lines of a caption or before the link.	Hide it behind a 'more' button, at the very end of a long post, or only in a bio.	If a reader has to tap to see the disclosure, it is not conspicuous.
Use 'Ad,' 'Paid partnership,' 'Affiliate link,' or 'Gifted from [brand].'	Use #sp, #spon, #partner, or vague phrases like 'thanks to the brand.'	The FTC says disclosures must be understandable to ordinary consumers.
Show the disclosure on screen early and long enough to read, and say it out loud.	Flash it for one second, put it only in the description, or rely on music lyrics.	Viewers may miss a fleeting disclosure or never open the description.
State the relationship at the start and repeat it before you show or mention the product.	Mention it only once at the very beginning of a multi-hour stream.	New viewers join mid-stream and may not see an early disclosure.
Disclose when you got the product free or at a steep discount, even if you were not paid cash.	Say 'I bought this myself' when you did not, or skip the tag because no money changed hands.	Free products are still compensation and can affect credibility.

Disclose family, employer, friend, or equity ties to the brand.	Promote your brother's supplement line without saying he is family.	Close personal or financial ties change how people weigh your opinion.
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Platform notes

Instagram: Use the paid partnership label when available, and repeat the disclosure in the caption for safety. Stories need a text sticker on the same slide as the product.

TikTok: Use the 'Paid partnership' toggle and show the disclosure in the video itself, not just the caption.

YouTube: State the relationship in the video and in the first two lines of the description. A pinned comment helps but is not enough alone.

Blog / email: Place a short disclosure at the top of the post or above the first affiliate link. A footer-only disclosure is risky.

Live streams: Repeat the disclosure each time you return to the product and keep it visible on screen if the platform allows.

Fix it: before and after

Obsessed with this serum! Link in bio. #skincare #glowup	Ad Obsessed with this serum! If you buy through my link, I may earn a small commission. #skincare #glowup	Adds a clear 'Ad' label and explains the affiliate link before the user clicks.
Thanks @brand for the gifted stay! Swipe for room tour.	Gifted stay from @brand. All views are my own. Swipe for room tour.	States the free stay upfront so the hotel recommendation is transparent.
Use code MEGAN20 for 20% off (no mention of earnings).	Use code MEGAN20 for 20% off. I earn a small commission on sales — thanks for supporting the channel.	Discloses the personal financial benefit tied to the discount code.

What it costs to get wrong

The FTC can seek civil penalties up to \$50,120 per violation, and state attorneys general can bring their own cases. Platforms also remove monetization, affiliate accounts, and storefronts for repeated disclosure failures.

Module exercise

Exercise 1: Map your material connections

List every brand, affiliate program, free product, discount code, or referral relationship you promoted in the last 90 days. Next to each, write the disclosure you used and where it appeared.

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Score each disclosure: Is it before the link? In the same post? Easy to notice? In plain language? If any answer is no, rewrite it using the swipe file.

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Module 2: Claims You Can Prove

If you say it, you must be able to back it up.

Marketing claims are powerful — and dangerous when they are exaggerated or unsupported. The FTC requires advertisers to have competent and reliable evidence before making objective claims about earnings, health, performance, or typical results.

Key rules

- Objective claims need competent and reliable scientific or business evidence before publication.
- Earnings claims must show what the typical participant or customer actually earns.
- Health and weight-loss claims usually need human clinical evidence.
- Testimonials and before/after photos must reflect typical results, or the typical result must be disclosed.
- Urgency and pricing claims must be real; fake scarcity is deceptive.

Do this, not that

Do this	Not that	Why
Say 'Typical earnings are \$X per month; some earn nothing' and keep records.	Show only the top earner's results with 'You can make \$10K/week.'	Exceptional results are misleading unless typical results are clearly disclosed.
Limit claims to what the science supports and include required disclaimers.	Say a supplement cures, treats, or prevents a disease without FDA approval.	Disease claims for supplements are illegal without proper drug approval and evidence.
Use genuine reviews and disclose if results are not typical.	Use a testimonial that promises a specific result most users do not get.	A glowing review can mislead if buyers expect the same outcome by default.
Label them clearly, disclose timing, and note results are not typical if that is true.	Use photoshopped, borrowed, or unrepresentative images without context.	Visual proof is persuasive; faked or atypical images deceive consumers.
Only run real, time-limited offers with a genuine end date.	Fake countdowns that reset, 'only 2 left' when stock is plentiful, or perpetual flash sales.	False scarcity pressures consumers into decisions based on lies.
Show the full price a buyer will pay, including mandatory fees, before checkout.	Advertise '\$0' or '\$1' when the buyer must buy a subscription or pay hidden fees.	Consumers must know the real cost before committing.

Fix it: before and after

Join my course — I made \$50K in my first month!	I made \$50K in my first month. Typical student earnings in the first year are \$2,000–\$5,000. Some earn nothing. Past performance does not guarantee future results.	Adds typical results and a clear disclaimer so the outlier is not mistaken for the norm.
This tea melts belly fat in 7 days!	This tea is part of a balanced diet and exercise plan. Weight loss results vary and are not guaranteed.	Removes the unsupported disease/weight-loss claim and adds a realistic qualifier.
Only 2 spots left at 90% off! (The timer resets every day.)	Sale ends Friday at 11:59 p.m. ET. Prices return to regular rates after that.	Replaces fake scarcity with a real deadline and avoids misleading stock claims.

What it costs to get wrong

The FTC has obtained orders and civil penalties in the hundreds of millions of dollars for deceptive earnings and health claims. Individual influencers have also been fined tens of thousands of dollars per violation.

Module exercise

Exercise 2: Substantiate your claims

Pick three claims you have made in the last 30 days (earnings, health, performance, or savings). For each, find the evidence you had before posting.

If you cannot find contemporaneous evidence, note the claim as a risk and either remove it or add a qualifying statement that reflects the typical experience.



Module 3: Reviews & Endorsements

Real opinions only. No gating, no buying, no faking.

Reviews and endorsements are social proof, but only when they are genuine. The FTC prohibits review gating, fake reviews, undisclosed insider reviews, and paying for reviews without disclosure. A 2023 FTC rule also makes it illegal to create or sell fake consumer reviews.

Key rules

- Do not suppress negative reviews or steer only happy customers to review platforms.
- Do not write, buy, or commission fake reviews, and do not use AI to generate fake reviews.
- Employees, family, and friends reviewing your product must disclose the relationship.
- Incentivized reviews must disclose the incentive clearly.
- Brands and agencies are responsible for monitoring the reviews they influence.

Do this, not that

Do this	Not that	Why
Ask all customers for feedback and send everyone the same review link.	Send satisfied customers to Google and unhappy ones to a private survey.	Cherry-picking reviews misrepresents the real customer experience.
Offer a small incentive to all reviewers and clearly disclose it.	Pay for five-star reviews or require a positive review to get a discount.	Payment for positive reviews corrupts the review ecosystem and is illegal.
Have employees or family members disclose their connection if they review.	Let staff post glowing reviews without saying they work for the company.	Insiders have a bias that consumers deserve to know about.
Grow followers and engagement organically.	Buy followers, likes, or comments to fake popularity.	Artificial social proof deceives both consumers and platforms.
Publish honest testimonials, even critical ones, and respond professionally.	Edit reviews to remove negatives or only show curated praise.	Selective editing can make an average product look flawless.
Use AI for drafting support content, not for posting fake customer reviews.	Generate dozens of five-star reviews and post them as real customers.	The FTC's 2023 rule specifically bans fake or AI-generated consumer reviews.

Fix it: before and after

Loved your stay? Leave us a Google review. Had issues? Email us directly.	How was your stay? Share your honest review on Google — good or bad, we read every one.	Asks all customers the same way and does not steer negative feedback out of sight.
Post a 5-star review and we'll send you a \$50 gift card!	Leave an honest review and we'll send you a \$5 coffee credit as a thank you. We welcome all ratings.	Rewards honest feedback, not a specific star rating, and discloses the incentive.
A brand's marketing team posts reviews under fake names.	Only genuine, verified purchasers are invited to review, and employees disclose their relationship if they do.	Removes fake personas and requires insider disclosure.

What it costs to get wrong

The FTC's Rule on Consumer Reviews and Testimonials carries civil penalties up to \$50,120 per violation. The FTC has sued companies for review gating, fake review broker schemes, and suppressing negative reviews.

Module exercise

Exercise 3: Audit your review workflow

Look at your last 10 reviews or testimonials. Which ones were written by people with a material connection? Which were edited, incentivized, or syndicated?

For each risky review, draft a corrected version or decide to remove it. Record the action in the audit tracker.



Module 4: Ads, Data & Billing

Don't trick people into subscribing or giving up data.

Digital marketing does not end at the click. Subscription terms, cancellation flows, consent for messages, children's privacy, and data promises are all regulated. Dark patterns — design tricks that push users into choices they do not want — are a growing enforcement target.

Key rules

- Negative-option billing must be clearly disclosed before payment, with simple cancellation.
- Email marketing needs consent and a working unsubscribe link.
- SMS marketing needs express written consent; replies must be honored.
- Do not collect children's data without verifiable parental consent under COPPA.
- Privacy policies must be accurate and match what you actually do.

Do this, not that

Do this	Not that	Why
Clearly state the full price, billing frequency, and cancel method before the user pays.	Hide the recurring charge in tiny print behind a 'Start free trial' button.	Consumers must understand what they are agreeing to pay.
Make canceling as easy as signing up, with the same number of steps.	Force users to call, chat, or click through six screens to stop a subscription.	The FTC's click-to-cancel rule requires cancellation to be simple.
Show all mandatory fees on the first pricing screen.	Add surprise service, processing, or convenience fees at checkout.	Unexpected fees increase the real price and deceive consumers.
Only email people who opted in, and honor opt-outs quickly.	Buy email lists or add every customer to marketing emails without permission.	Unsolicited email violates CAN-SPAM and erodes trust.
Get clear written consent for texts and tell people how to stop them.	Text promotional offers to anyone whose phone number you have.	TCPA violations can cost \$500–\$1,500 per message.
Avoid collecting data from children under 13 unless you comply fully with COPPA.	Track kids, use their photos, or sell their data without parental consent.	COPPA imposes strict limits on data collection from children.

Fix it: before and after

Start your free trial now! (small print: \$89/month after 3 days, cancel by phone only)	3-day free trial, then \$89/month. Cancel anytime in your account settings — same steps as signing up.	Makes the real cost and cancellation path clear before sign-up.
Your order total is \$19.99 ... Surprise! A \$12.99 'processing fee' appears at the last step.	Order total: \$32.98 (includes \$19.99 product + \$12.99 processing fee). No hidden charges.	Discloses all mandatory fees on the first pricing screen.
We got your number at checkout, so we'll text you deals.	Want deal alerts by text? Reply YES to opt in. Reply STOP anytime.	Gets explicit opt-in and provides a clear opt-out path.

What it costs to get wrong

The FTC has obtained billions in refunds and penalties for deceptive subscription and telemarketing practices. TCPA lawsuits can run into the tens of millions of dollars, and COPPA violations carry fines up to \$51,744 per child affected.

Module exercise

Exercise 4: Clean up your ads and billing

Review one active ad and one checkout or subscription flow. Identify any dark pattern, hidden fee, unclear billing term, or misleading before/after image.

Rewrite the copy and flow so the consumer can make an informed choice. List the changes and who will approve them.



Personal compliance plan

Use this page to summarize your commitments and next steps.

My disclosure process:

How I substantiate claims:

My review/testimonial policy:

Data and billing checks:

Quarterly review date: