

Case 8: Is it a recommendation or an ad?

Gia loves a novel that a publisher sent her for free, and her video review does not mention the free copy yet.

On your own Read What happened. Underline what the publisher sent Gia and what it asked for. About 4 minutes.



Gia, Caio and Mari set up a camera in a bright studio.

Your role: You're the viewer with the sound off who checks the first three seconds. **New skill:** Spot and disclose a material connection.

What happened

At 1:30 p.m. on Saturday, Caio finishes editing Gia's short video review of a new novel. Gia made the review for BookTok, where people recommend books on TikTok. She stayed up until 2 a.m. to finish the novel, and she loves it.

Two weeks ago, the book's publisher emailed Gia. The publicity team offered her a free copy of its spring novel for review. The email said she did not have to post, but it asked for a tag if she did. In the first cut, Gia never says the book was free. The only sign of the publisher is a tag in the caption below the video.

Caio wants to watch the cut the way a stranger would, on a phone with the sound off. He wants to know whether the first three seconds say the book was free. Gia wants to keep her honest opinion in the video. She also wants viewers to know how she got the book.

Your question: Do Gia's viewers need to know the book was free, and how should she tell them?

Key terms

On your own Read each key term and its example. Then write your first guess in the box. About 4 minutes.

Material connection A material connection is a relationship with a brand, like payment or a free product, that viewers might not expect.

En español: conexión material

In this case: The publisher sent Gia a free copy of its spring novel for review. That free copy is a material connection.

Disclosure A disclosure is a clear statement that tells people about a relationship or fact they would want to know.

En español: divulgación

In this case: Gia's first cut has no disclosure. The tag in the caption names the publisher but never says the book was free.

Endorsement An endorsement is a message that shares someone's opinion or experience of a product to promote it.

En español: respaldo

In this case: Gia's video review promotes the novel with her own opinion: she stayed up until 2 a.m. to finish it.

Who is involved



Gia

Made the video review

"I stayed up till 2 a.m. finishing it. That part's real. The publisher sending it free is also real, and right now it's nowhere in the video."



Caio

Editing Gia's video

"The publisher's email literally says 'free copy for review.' That's the sentence. It's just not in the video yet."

Before you look at the evidence, does Gia need to tell viewers the book was free?

[illegible]

Reading passage

Honest opinion, hidden relationship

On your own Read the passage. At each Stop and think box, pause and answer the question in your head or with a partner. About 5 minutes.

Words to know

- **Material connection:** A material connection is a relationship with a brand, like payment or a free product, that viewers might not expect.
- **Disclosure:** A disclosure is a clear statement that tells people about a relationship or fact they would want to know.
- **Endorsement:** An endorsement is a message that shares someone's opinion or experience of a product to promote it.
- **Framing:** Framing is choosing which parts of a situation a message brings forward.

The story: The edit that is almost done

Gia's review is sincere. She stayed up until 2 a.m. finishing the novel, and her video for BookTok, TikTok's book-recommending community, captures that. Caio, who edits video and has a habit of checking before posting anything that involves someone else, finishes the cut at 1:30 p.m. on Saturday. Gia is ready to publish.

Caio asks for one more pass, done the way most viewers would watch: once, on a phone, with the sound off. He is looking at the first three seconds. The question he wants answered is whether a stranger could tell that the book was free.

It was. Two weeks earlier, the publisher's publicity team emailed Gia to offer a free copy of its spring novel for review. The email said there was no obligation to post but asked for a tag if she did. The first cut opens with Gia saying she literally could not put the book down. There is no on-screen text, and the only trace of the publisher is "@publisher #booktok" in the caption below the video.

Gia's first defense is the tag. Caio's edit notes reply in four words: tag equals brand name, not relationship. Your role in this case is to be the viewer with the sound off who checks the first three seconds.

Stop and think. Why does the case insist that the free copy does not make Gia's opinion false?

Separating the opinion from the relationship

Three terms keep the analysis clean. An **endorsement** is a message that shares someone’s opinion or experience of a product to promote it. A **material connection** is a relationship with a brand, like payment or a free product, that viewers might not expect. A **disclosure** is a clear statement that tells people about a relationship or fact they would want to know. Gia’s review is an honest endorsement with an undisclosed material connection. The connection does not make her opinion false. It changes what a viewer needs to know to weigh it.

This is a framing problem, in the Case 1 sense of **framing**: choosing which parts of a situation a message brings forward. The first cut brings forward enthusiasm and leaves the relationship in a caption that many viewers never open. Caio’s fix reorders the frame without deleting anything true. The video opens with a three-second line, “Quick heads-up, the publisher sent me this free,” spoken and on screen, followed by Gia’s hook.

The case also asks what a disclosure does not do. Gia had considered calling the novel the best book of the year and then asks herself, out of the ones she happened to read? She replaces the superlative with what she can support: two nights, could not put it down. A disclosure answers how she got the book. It does not make every claim in a review accurate.

Finally, the case tests the fix on an audience. Caio will show the cut to someone who did not help make it and ask whether the book was free. If they hesitate, the disclosure is not clear yet. A comment on another creator’s review shows the cost of late discovery: “wait was this sponsored?? kind of feels like an ad now.” The comment is about someone else, and nobody knows whether that review was sponsored, which is the point.

 **Stop and think.** Apply the FTC’s “clear and conspicuous” definition to the caption tag. Does the tag meet it?

Rules, enforcement and evidence

The Federal Trade Commission’s Endorsement Guides explain how federal law against deceptive practices applies to endorsements. The current text says material connections “can include monetary payment or the provision of free or discounted products ... to an endorser, regardless of whether the advertiser requires an endorsement in return” (16 CFR Part 255, as revised 2023). The same guides define “clear and conspicuous” as “difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers.” FTC staff guidance for video says the disclosure belongs in the video itself, ideally both spoken and on screen (Federal Trade Commission, updated December 3, 2024).

Enforcement has followed. In November 2023, the FTC warned two trade associations and a dozen influencers about posts promoting aspartame or sugar, stressing that disclosures belong in the video, not a caption (Federal Trade Commission, November 14, 2023).

Rules, enforcement and evidence, continued

Trade coverage noted that sponsors share responsibility for clear disclosures (Food Dive, November 27, 2023).

Research on adolescents supports the rule's purpose. A study of 3,149 high school students in Taiwan found that full sponsorship disclosure helped teens recognize a post as an ad (Lin et al., PLOS One, May 27, 2026). Earlier work examined whether disclosures help younger and older teens notice when an influencer is paid (van Reijmersdal and van Dam, Journal of Youth and Adolescence, January 18, 2020).

 **Stop and think.** Who should make sure disclosures are clear: creators, brands or platforms?

Sources

Real source | Federal Trade Commission (FTC) | 2023

FTC Endorsement Guides (16 CFR Part 255)

Real source | Federal Trade Commission | December 3, 2024

Disclosures 101 for Social Media Influencers

Real source | Federal Trade Commission | November 14, 2023

FTC Warns Two Trade Associations and a Dozen Influencers About Social Media Posts Promoting Consumption of Aspartame or Sugar

Real source | Food Dive | November 27, 2023

FTC crackdown could change influencer marketing for food and beverages

Real source | PLOS One (Lin et al.) | May 27, 2026

Effects of social media sponsorship disclosure on adolescents' advertising literacy and purchase intention

Real source | Journal of Youth and Adolescence (van Reijmersdal & van Dam) | January 18, 2020

How Age and Disclosures of Sponsored Influencer Videos Affect Adolescents' Knowledge of Persuasion and Persuasion

Look at the evidence

On your own Read each document. For each one, write what it shows and what it leaves out. About 8 minutes.

Evidence A | Email

The publisher’s email

“Hi Gia, we love your book reviews! We’d be glad to send you a free copy of our spring novel for review. There’s no obligation to post, but if you do, we’d appreciate a tag. Best, the publicity team”

Look closely: What did the publisher give, and what did it ask for?

What it shows	What it leaves out

Evidence B | Video script and caption

Gia’s first cut

Spoken: “You guys, I have to tell you about this book because I literally could not put it down!” On-screen text: none. Caption below the video: “@publisher #booktok

Look closely: Where in this video would a viewer learn about the free copy?

What it shows	What it leaves out

Look at the evidence, continued

Evidence C | Edit notes

Caio’s edit notes

“Watch once as a stranger, phone on mute. 0:00—0:03: does anything say free copy? Caption sits below the video; most people won’t open it. Tag = brand name, not relationship.”

Look closely: What does Caio want to test before uploading, and why the first three seconds?

What it shows

What it leaves out

Evidence D | Viewer comment

A comment on another creator’s review

wait was this sponsored?? kind of feels like an ad now

Look closely: When does this viewer start to wonder about a sponsorship?

What it shows

What it leaves out

What is still missing from the evidence?

Key idea: material connections

On your own Read the key idea and the FTC guide. Then answer the question in the box. About 10 minutes.

An **endorsement** is a message that shares someone's opinion or experience of a product to promote it. Gia's video review is an endorsement, and her opinion in it is honest. A **material connection** is a relationship with a brand, like payment or a free product, that viewers might not expect. The free copy from the publisher is a material connection. Knowing about it gives viewers context, but it does not prove that Gia's opinion is false.

The Federal Trade Commission (FTC) is a federal agency. Its Endorsement Guides explain how a federal law against deceptive practices applies to endorsements. A **disclosure** is a clear statement that tells people about a relationship or fact they would want to know. For a video, the FTC says the disclosure belongs in the video itself, ideally both spoken and on screen. A tag in the caption only names the brand, and it sits below the video.

A disclosure answers one question: how did Gia get the book? Viewers can still ask what supports her claims about the book itself. A clear disclosure does not make every claim in a review accurate. Do not accuse a real creator of hiding a sponsorship based on a guess.

Professional standards

Real source | Law or regulation | Federal Trade Commission (FTC)

FTC Endorsement Guides (16 CFR Part 255): § 255.5 Disclosure of material connections

“They can include monetary payment or the provision of free or discounted products ... to an endorser, regardless of whether the advertiser requires an endorsement in return.”

In plain words: The FTC says a free product can be a connection that reviewers must clearly disclose, even if the brand asked for nothing in return.

Question: The publisher's email says there is “no obligation to post.” Does that change whether Gia has a connection to disclose?

Professional standards, continued

Your answer

The FTC text says ____, so ____.

In the news



Real source | NBC News | November 15, 2023

Influencers warned by FTC over ‘inadequate’ disclosures of artificial sweetener promotions

Real creators were warned for not clearly saying they were paid, the exact question this case asks.



Real source | ABC News | November 6, 2019

Popular YouTuber chimes in on federal product disclosure guide for influencers

A creator reacts to the FTC’s disclosure rules, showing how the guidance lands for people who actually post.

Notes

Sort the evidence

On your own Follow each choice to its results. Then write whose view is missing. About 7 minutes.

Follow both choices forward. Which consequences can Gia control, which depend on viewers, and what test tells her the disclosure worked?

Post the first cut with only a brand tag in the caption

Sound-off viewers never learn the book was free

Who is affected

Disclose aloud and on screen in the first seconds

Viewers weigh the recommendation knowing the relationship

Who is affected

Some viewers may discount the review as an ad

Who is affected

Whose perspective is missing?

Whose view is missing from these documents? What would you ask them?

The view that is missing is _____. I would ask _____.

Practice: choose a response

On your own Choose the change that makes the relationship clearest. Then fix the two marked phrases. About 6 minutes.

Gia loves the novel the publisher sent her for free. Which change to her video makes the relationship clearest to viewers?

- ☐ **A** Tag the publisher in the caption.
- ☐ **B** Say and show at the start of the video that the publisher sent her the book for free.
- ☐ **C** Leave the video as it is, since the email said there was no obligation to post.

Why I chose it

Improve a draft

A student's first draft

Okay you guys, I have to tell you about this book because I literally could not put it down!! **1** #ad #booktok @publisher. The characters are so real and the ending destroyed me. I stayed up until 2 a.m. finishing it and then just sat there staring at the wall. Everyone needs to read this, trust me, **2** it's the best book of the year and you won't regret it. Link is in my bio, go get it before everyone else does!

Rewrite each marked phrase so it says only what the evidence supports.

Rewrite phrase 1

Rewrite phrase 2

Grades 11—12

Your task

On your own Read the steps. Fill in the planner boxes before you start your draft. About 12 minutes.

Build a creator communications policy for the crew: when to disclose, how, and how to check it worked.

Use: FTC Disclosures 101, the FTC endorsement FAQ and case evidence.

You'll make: Policy, 400—500 words

Time: 60 minutes

- 1 Reread Evidence A, B and C. Note what the publisher gave and where the first cut names it.
- 2 Fill in the planner: when to disclose, how, how to check and guidance versus statute.
- 3 Draft the core of your policy on the Your draft page.
- 4 Include one step that tests a disclosure on a viewer before posting.
- 5 Write the full policy of 400 to 500 words in the online workspace or on paper.
- 6 Say that the policy guides the crew and is not legal advice.
- 7 Check your policy with the questions on the Check your work page.



Prefer typing? Scan to open the online workspace.

When the crew discloses

Disclose when ____.

Your task, continued

How the crew discloses

How the crew checks it worked

Guidance and statute

The FTC Act _____. The Endorsement Guides _____.

Notes

On your own Write your draft in the boxes. Use your planner from the page before. About 28 minutes.

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Check your work

On your own Answer the Check your work questions and mark your level in each rubric row. Then write one change you made. About 8 minutes.

Does your policy say when to disclose, including free products?	☐ Yes ☐ No
Does it cover audience, channel and consistency?	☐ Yes ☐ No
Does it explain the FTC guides as guidance on the FTC Act?	☐ Yes ☐ No
Does it include a step that checks whether a disclosure worked?	☐ Yes ☐ No

How your work is scored

Mark one box in each row.

Skill	Beginning	Developing	Proficient	Advanced
Evidence	☐ No disclosure or claim support.	☐ Tag only.	☐ Names the relationship clearly.	☐ Names the relationship and supports the product claim.
Reasoning	☐ Treats opinion as a substitute for disclosure.	☐ Discloses but can't explain why.	☐ Explains why placement and clarity matter.	☐ Distinguishes opinion, relationship and product claim.
Audience & purpose	☐ Ignores viewers.	☐ Assumes viewers read captions.	☐ Works for sound-off viewers.	☐ Works across channels with consistent wording.
Revision	☐ No change.	☐ Adds a hashtag.	☐ Adds spoken and on-screen disclosure.	☐ Explains each placement choice for different viewers.

One change I made after feedback

This image shows a single page of white paper with horizontal blue lines, resembling notebook paper. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Questions to discuss

On your own Write a short answer to each question. Then finish My take. About 10 minutes.

- 1** Would knowing the book was free change how much you trust Gia's review? Why or why not?

- 2** Some viewers may treat a review with a disclosure as just an ad. How could Gia keep their trust?

- 3** Who should make sure disclosures are clear: creators, brands or platforms?

My take

My claim: ____.

The best evidence is ____, because ____.

Someone who disagrees might say ____.

[illegible]

Talk about this case at home

Case 8: Is it a recommendation or an ad?

In this case, a publisher sends Gia a free novel, and her video review does not say the book was free. Your student read the email and the video script, then rewrote the opening so viewers learn about the free copy.

Questions to talk about

- 1 How can you tell when a video review is also an ad?
- 2 Where in a video would you look for a note that a product was free?
- 3 Why might a review still be honest if the reviewer got the product for free?

Nobody needs to share personal stories or private information to talk about this case.



See the case online.