



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Mary K. Engle  
Associate Director

September 6, 2017

Ms. Lindsey Lohan  
c/o Chris Smith  
ICM Partners  
10250 Constellation Boulevard  
Los Angeles, California 90067

Dear Ms. Lohan:

As you may recall, I wrote to you in March regarding one of your Instagram posts endorsing the Pinnertest Food Intolerance Test. As I said in my earlier letter, if you are endorsing a brand and have a “material connection” with the marketer (that is, a connection or relationship that might affect the weight or credibility that your followers give the endorsement), then your connection should be clearly and conspicuously disclosed, unless the connection is already clear from the context of the endorsement. Material connections could consist of a business or family relationship, or your receipt of payment, free products or services, or other incentives to promote the brand.

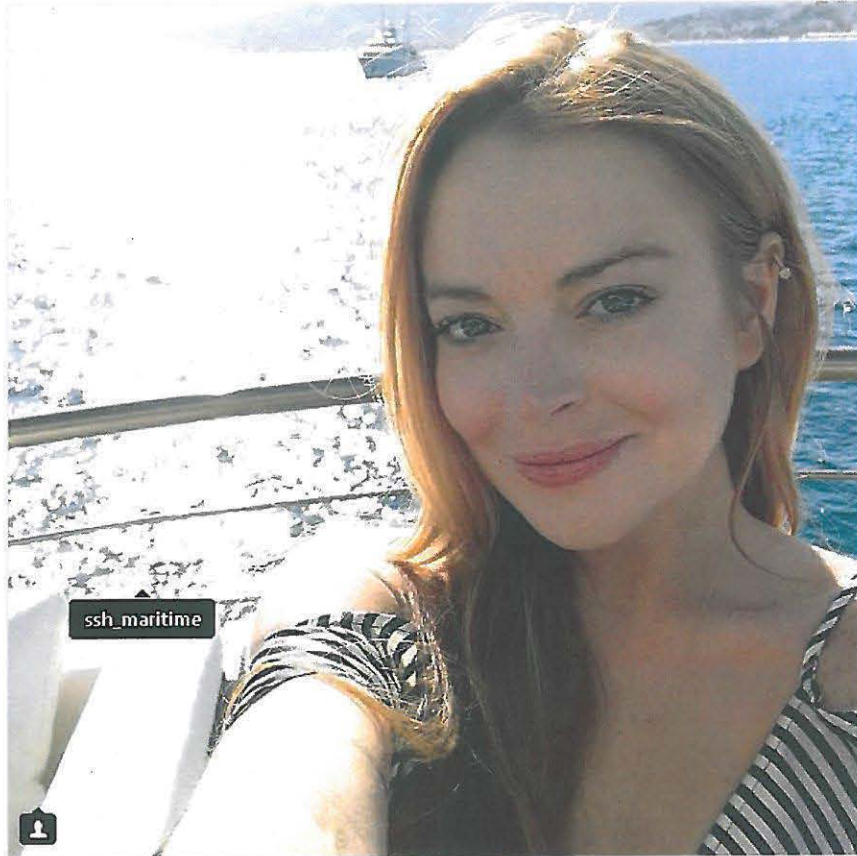
Two of your other Instagram posts, attached to this letter, have recently come to our attention. In one, you posted a video of yourself cooking and wrote, “Cooking on a #boat In @alexanderwangny 🍷🍷.” In another, you posted a selfie on a boat and wrote, “#cannes 🍷🍷🍷 #chakra #blessed #LohanJewelry @ssh\_maritime.” Also, in the photo, you tagged “ssh\_maritime.” The FTC staff believes that tagging a brand or business is an endorsement of the brand or business. Accordingly, if you have a material connection with a tagged business or the marketer of a tagged brand, then your posts should disclose that connection. Neither post discloses whether you have a material connection.

Please provide a written response to this letter by September 30, 2017 advising the FTC staff of whether you have a material connection with Alexander Wang and with SSH Maritime Services. If you have a material connection with either, please describe what actions you are or will be taking to ensure that your social media posts endorsing brands and businesses with which you have a material connection clearly and conspicuously disclose your relationships.

Please direct your correspondence to Michael Ostheimer or Mamie Kresses of my office. If you have any questions, contact Mr. Ostheimer at (202) 326-2699 or [mostheimer@ftc.gov](mailto:mostheimer@ftc.gov) or Ms. Kresses at (202) 326-2070 or [mkresses@ftc.gov](mailto:mkresses@ftc.gov). Thank you.

Very truly yours,

Mary K. Engle  
Associate Director  
Division of Advertising Practices



**lindsaylohan**

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**lindsaylohan** #cannes 🥰🥰🥰 #chakra #blessed #LohanJewelry @ssh\_maritime

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**andres.7.summer** ♡,♡

**ronalfirman** Beautiful

**sephiorthcloud** Beautiful women

**louis\_heyzen** Freaky Friday?

**\_anita\_grava\_** Beautiful 😊❤️

**\_anita\_grava\_** I LOVE YOUU

**\_anita\_grava\_** 😊

**beachbabe\_028** glowing, absolutely wonderful!

**anniaflandes** Oh hey you look good

**herbsarahoneycomb2** Beautiful and blessed beloved

**herbsarahoneycomb2** Beautiful and blessed



**206,440 likes**

MAY 21

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**lindsaylohan**

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**lindsaylohan** Cooking on a #boat In @alexanderwangny 🥰🥰

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**javatug** #lilocookingshow

**zuraya\_040** Is she muslim @lindsaylohan

**euler\_81** She is beautiful 🥰🥰

**afrimaya** Delicious @lindsaylohan 🙄

**maqk92** □□□□

**jos.kuijer** @maria6x noticed the same thing

**gugalifes** Me chama né migahhhh @lindsaylohan

**\_benbutler** I'm surprised people and the media haven't dissected this and freaked out that there is bottles of wine on the counter. 🥰 @lindsaylohan

**lorenfreire** Love you @lindsaylohan and I cannot be more happy with everything that



902,206 views

MAY 29

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