

# ME TO WEOPOLOY

CREATED BY: ALPHA LAW

WE Charity & Influencers fail to disclose “Free Trips to Kenya”

Competition Bureau & Federal Trade Commission (FTC)  
To investigate potential illegal endorsements



REPORT FOR  
PARLIAMENT # 5





# Competition Bureau: The law of influence: social media and the duty to disclose

The Competition Act has a civil and a criminal framework to regulate false or misleading representations. Influencers and the companies behind them may both be liable under the Act. Making a materially false or misleading representation is generally categorized as a civil matter and can lead to financial and reputational consequences (see section 74.01). If the representation rises to the level of being made “knowingly or recklessly”, it may substantiate a criminal charge and fines of up to \$200,000 (see section 52). In determining the gravity of the misrepresentation, the Act provides that both the general impression created by the advertisement as well as the literal meaning of the text should be taken into account. For most purposes, the consumer’s “general impression” is the basic rule.



FEDERAL TRADE COMMISSION  
PROTECTING AMERICA'S CONSUMERS

## FTC - Disclosures

**WE Charity “Free Trips”** -WE Charity failed to disclose that WE Charity Ambassadors received “Free Trips” to stay at locations owned by “ME to WE Social Enterprises. Ambassadors need to disclose their trip was paid for and their endorsement of WE Charity is a PAID ENDORSEMENT.

**WE Charity Ambassadors** - The use of “#ambassador” is ambiguous and confusing. Many consumers are unlikely to know what it means. By contrast, “#XYZ\_Ambassador” will likely be more understandable (where XYZ is a brand name). However, even if the language is understandable, a disclosure also must be prominent so it will be noticed and read.



# WE Celebrity Ambassadors / Trips



Selina Gomez



Lily Singh



Joe Jonas

Joe Jonas sings praises of hands-on experience



On a site visit to Africa, pop star Joe Jonas learns first-hand what the women in the Maasai Mara national reserve go through to fetch water for their families.

- TRENDING
- 1 Chiu san, in X
  - 2 Life bo s, ror
  - 3 Free tabl
  - 4 Geo best Cak, ppe
  - 5 om, b, si



Lily Singh



Natalie Portman

ME+WE Shop Trips Leadership Speakers Bureau Transparency Trips Portal

Women empowering women: Natalie Portman's journey to Kenya



With a string of beads in one hand, Natalie Portman throws her head back and laughs, flashing her contagious smile while sitting cross-legged with a group of Maasai women under the Kenyan sun. The layers of beaded necklaces encircling their necks jingle softly as they make jokes and exchanged stories of motherhood. This jewellery is made from the same beads Natalie held in her hands and like these women have been taught



nina dobrev



Demi Lovato



Hannah Simone



Sofia Carson



Bailee Madison



Jordan Fisher



Olivia Holt



Drew Scott



Kardinal



Malala Yousafzai

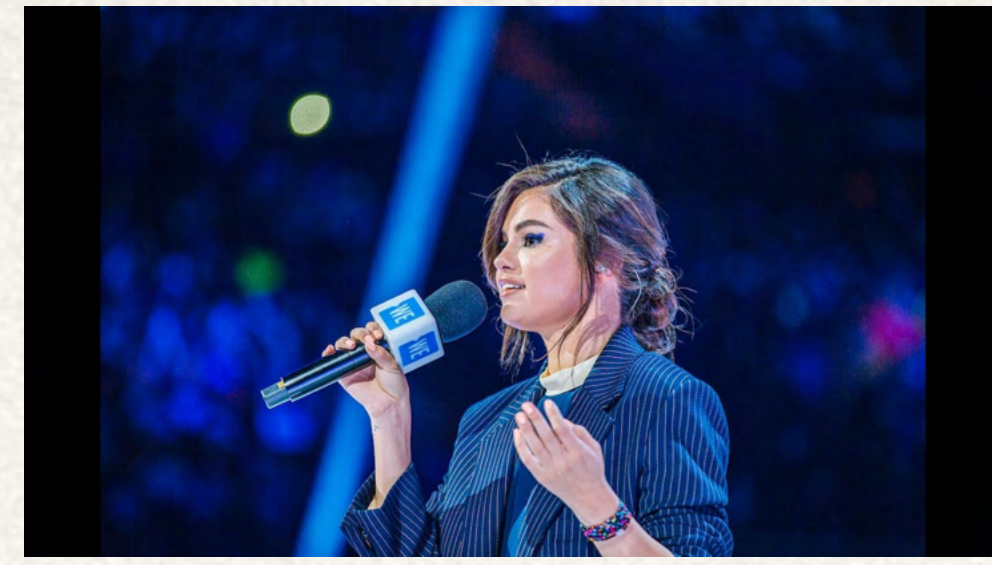


Nellie Furtado





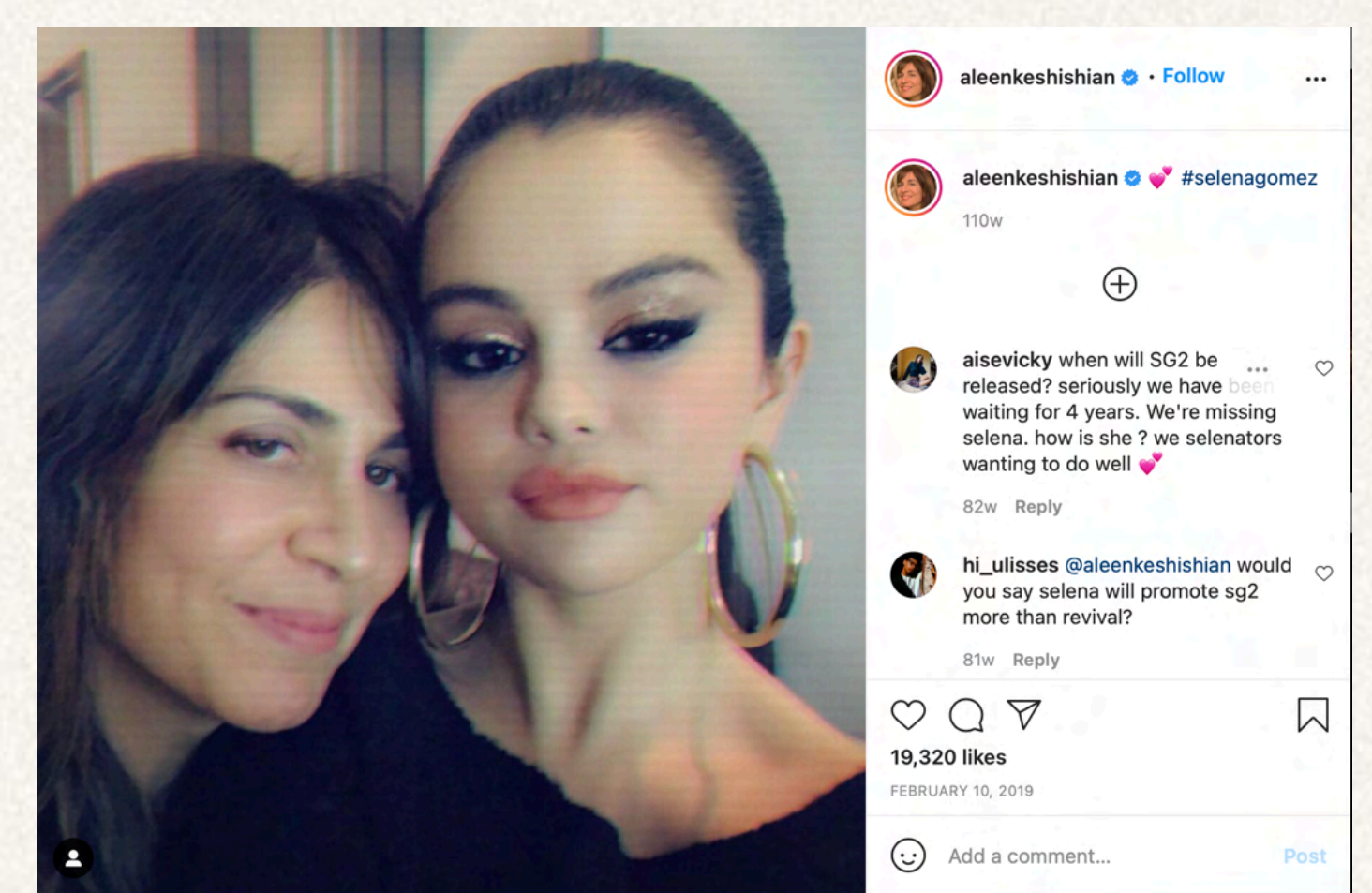
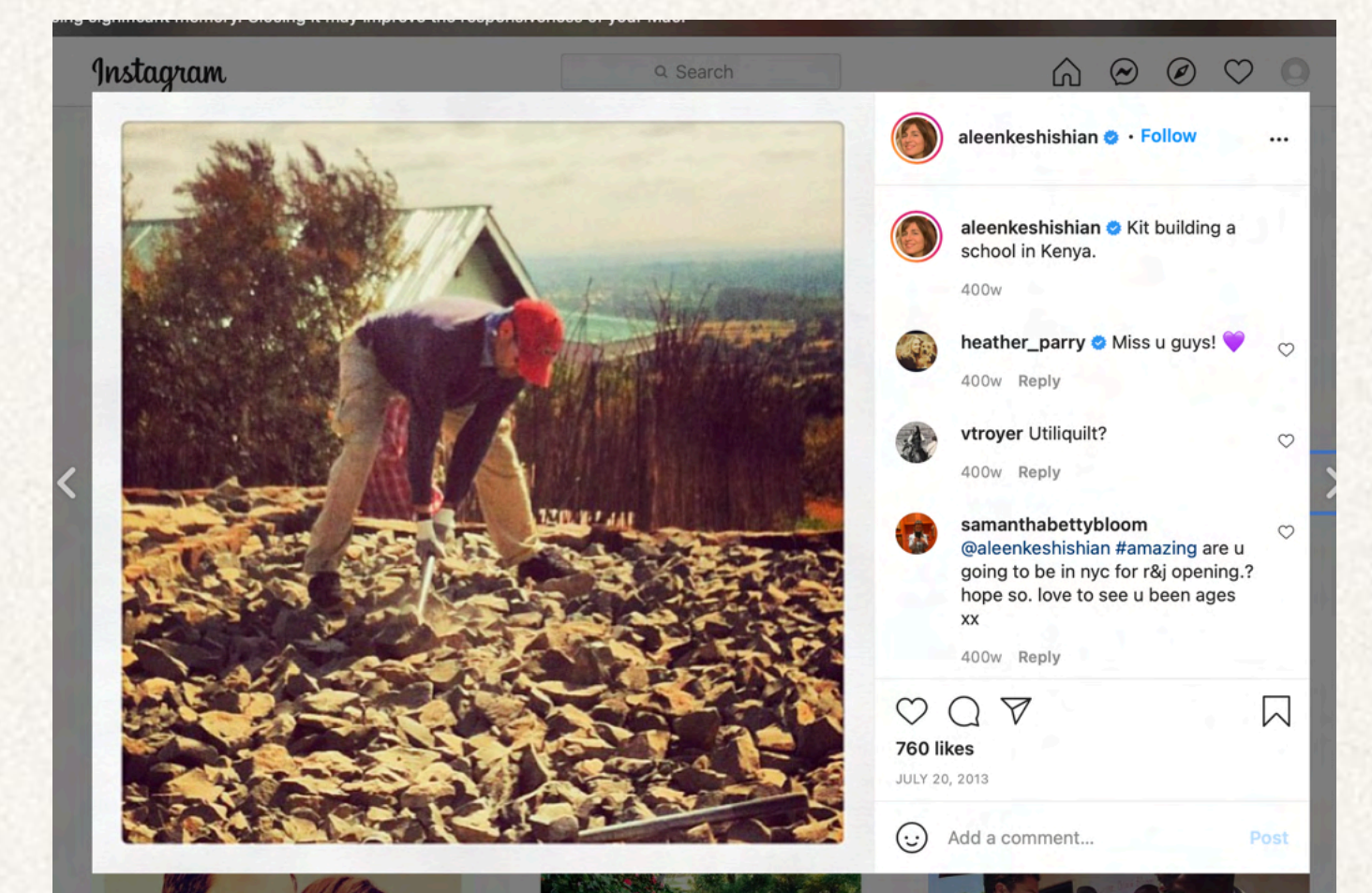
# WE Charity Board Member represents Celebrity Ambassadors



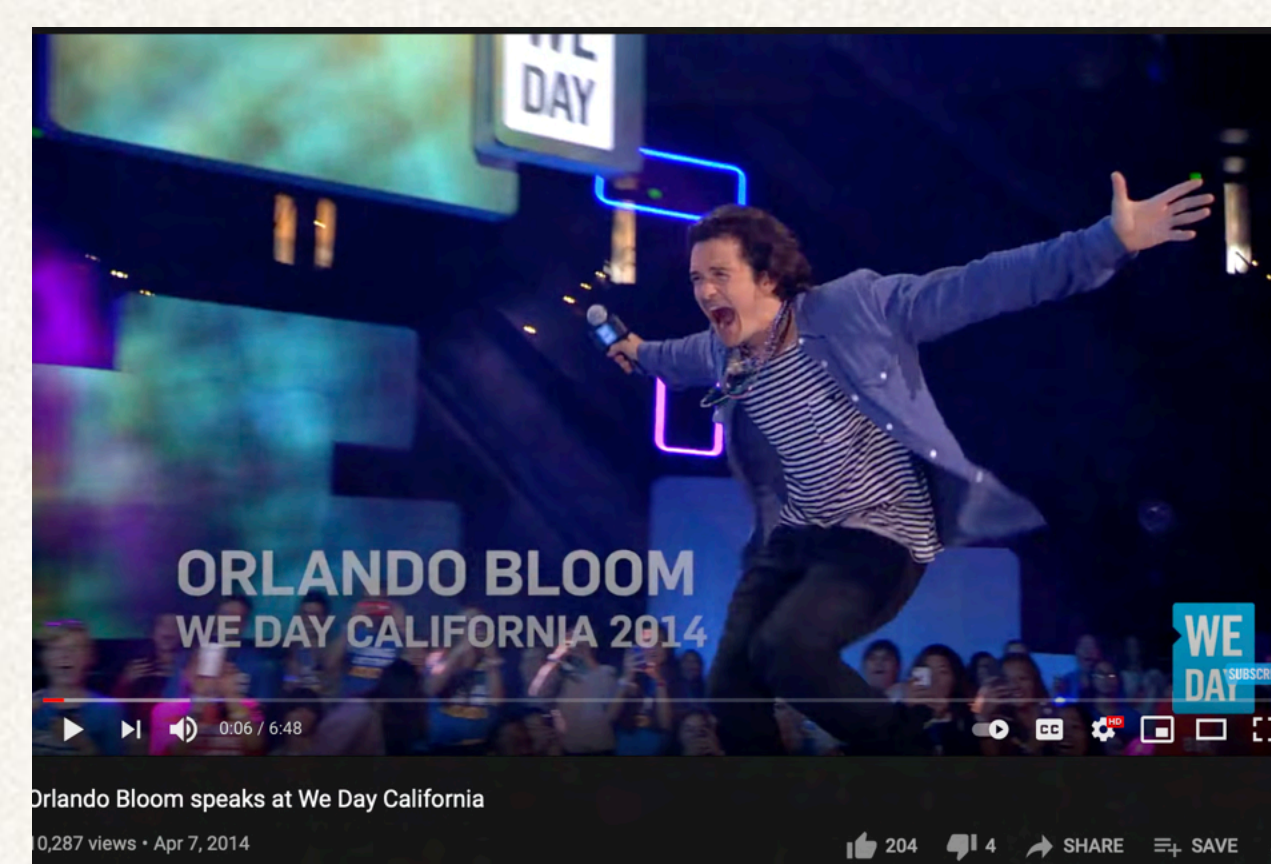
**Aleen Keshishian WE Board Member (2014) is the talent agent for Jenifer Aniston, Josh Gad, Nina Dobrev, Paul Rudd, and Selena Gomez**

**Aleen's son & relatives have also participated in trips to Kenya with WE Charity.**

**Jesse Keshishian**



**When Aleen's clients endorse the charity they need to disclose all payments & trips they received in exchange for the endorsements**



**Microsoft & the Bill & Melinda Gates Foundation are the largest donors to WE Charity.**

**Aleen's Instagram posts include disclosures of alleged meetings with Bill Gates, but not of her clients financial disclosures for WE Charity trips.**

