

Analysis of Proposed Consent Order to Aid Public Comment
In the Matter of Machinima, Inc., File No. 1423090

The Federal Trade Commission (“FTC” or “Commission”) has accepted, subject to final approval, an agreement containing a consent order from Machinima, Inc. (“Respondent”). The

Part III of the proposed order requires Respondent to take reasonable steps to ensure that its Influencer Campaigns comply with Parts I and II. Respondent is required to provide each influencer with a plain language statement of his or her responsibility to disclose clearly and conspicuously any material connection to the advertiser on whose behalf Respondent is conducting the campaign, and Respondent must obtain a signed acknowledgment of receipt of this statement from the influencer. Respondent must also institute specific monitoring procedures for online video endorsements that are part of its Influencer Campaigns. Respondent may not compensate an influencer for a video endorsement that has been posted online or otherwise been made publicly available until Respondent v0(s)-5(p204 Tc 0.004eb-6(2l)-10(s)-37/iR)-3(6s)-5()-10(I)19(n)-4(a)6