

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman  
Terrell

4. The acts and practices Respondent

him gambling on CSO Lotto, Martin did not mention any connection between himself and CGSO Lotto and when he posted the videos he made disclosures in the videos' descriptions.

13. Respondent Martin disseminated tweets that promoted CSGO Lotto and linked to his promotional videos. One such tweet read, "Made \$13k in about 5 minutes on CSGO betting. Absdutely insane. Reactions here : [YouTube link]" (March 6, 2016 tweet by @TmarTn). (Exhibit E). An Instagram post tnt

17. As described in Paragraphs 9 through 16, consumers who saw promotions of CSGO Lotto by Respondents Martin or Cassell were unlikely to learn of the connection between Martin or Cassell and CSGO Lotto. Even those who did learn of a sponsorship relationship with CSGO Lotto would not have learned that Martin and Cassell were officers and owners of the company operating CSGO Lotto and thus had a vested interest in the success of the service or that they were gambling with skins that were provided by that company

18. Respondents used “

e. "EZ \$\$\$\$\$\$ bets \$1,021.....WINS! @CSGOLotto [http://twitch.tv.castro\\_1021](http://twitch.tv.castro_1021)  
@twitch" [

Count II I  
Deceptive Failure to Disclose Endorsers Were Paid

28. Through the means described in Paragraphs 18 through 23, Respondent represented, directly or indirectly, expressly or by implication, that videos of influencers gambling on CSGO Lotto and the influencers' social media posts about CSGO Lotto reflect the opinions or experiences of individuals who had used the service. In n