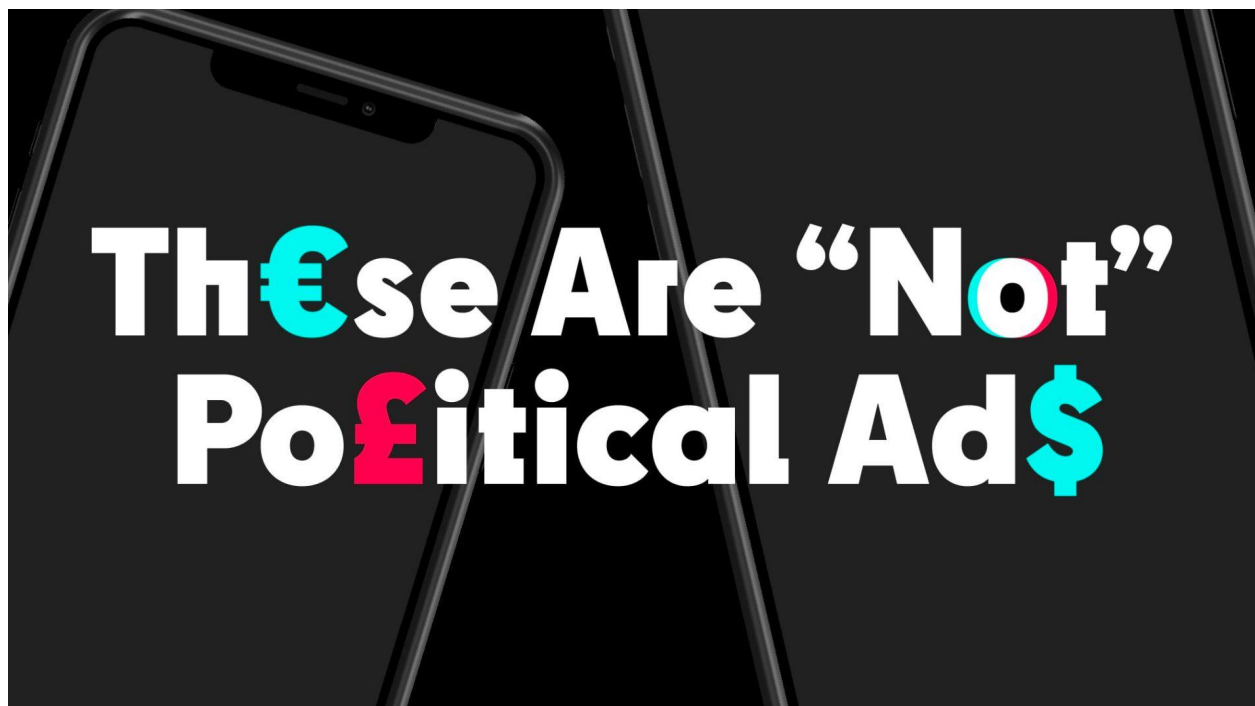


## These Are Not Political Ads: How Partisan Influencers Are Evading TikTok's Weak Political Ad Policies



Mozilla Foundation

June 2021

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## Executive Summary

As internet platforms continue to struggle with misleading and opaque political advertising, TikTok has branded itself as an outlier. The platform claims to have banned all political advertising, and positions itself as far more transparent than peers like Facebook and Google. But new research from Mozilla reveals a different story: Loopholes, lax oversight, and new forms of political advertising mean TikTok isn't free from partisan ads.

**This investigation reveals how political influencers are flying under the radar on TikTok, because TikTok's political ad policies are not strong and enforceable enough to monitor the full breadth of paid political influence on the platform.**

Our research suggests that TikTok influencers in the U.S. are being supported by political organizations to post content espousing their views. Despite the fact that TikTok "bans" political advertising, these creators regularly use their platforms to disseminate political messaging and viewpoints and they don't always disclose their paid partnerships.

Furthermore, we found that TikTok does not effectively monitor and enforce its rule that creators must disclose paid partnerships, nor does the platform proactively label sponsored posts as advertisements. Inconsistent disclosure practices—paired with zero ad transparency tools—makes it very difficult to monitor how political organizations are paying for influence on TikTok.

To address these problems and safeguard against abuse of the platform, we've also developed a set of recommendations to help TikTok and policymakers prepare for future elections around the world. TikTok should:

- 1. Develop mechanisms for creators to disclose paid partnerships.**
- 2. Invest in comprehensive advertising transparency on the platform, including introducing an ad database that includes paid partnerships.**
- 3. Update its policies and enforcement processes on political advertisements to ensure that they include all ways that paid political influence can happen on the platform.**

These three recommendations complement and reinforce Mozilla's [broader recommendations](#) to lawmakers on online political advertising.

## Introduction

Advertising on social media platforms takes a variety of forms, and increasingly it is centered on 'influencers'—content creators with large numbers of social media followers. Brands can work directly with influencers who create and post content that appeal to their audience instead of buying ad space from a platform. According to [a report on influencer marketing](#), the influencer industry is growing rapidly and will be worth an estimated \$15 billion by 2022, up from \$8 billion in 2019. But while content creators on platforms like Instagram, YouTube, and TikTok are attracting millions of followers and advertising dollars, platforms are not keeping pace with these trends in how they monitor and regulate advertisements.

TikTok is further behind than most. On TikTok there are different rules depending on whether advertisements are bought through TikTok's ad platform (including in-feed video, brand takeover, hashtag challenges, branded effects & sounds) or bought as sponsored influencer posts. Our research suggests that ads which are run directly through TikTok's ad platform are labelled and monitored internally as advertising, whereas paid posts by influencers are not.

For instance, influencer Charli D'Amelio (who has more than 100 million followers on TikTok) was [paid as much as \\$100,000 per TikTok post](#) to [promote a new Dunkin' Donuts drink](#). TikTok requires influencers like Charli to simply disclose the paid partnership by adding the hashtag #ad, without requiring any additional process or checks from the platform itself. While this is the minimum required to make the post compliant with [FTC guidance on advertising disclosures for social media influencers](#), other major platforms take more responsibility for monitoring this influential advertising by offering influencers straightforward ways to disclose their partnerships.

Instagram requires content creators to disclose paid partnerships by using a tool that they make available to creators. When creators use this tool, Instagram adds a [Branded Content tag](#) to the post before it goes live. Posts marked as branded content appear on Instagram with the label "Paid partnership with..." Instagram enforces this policy by [automatically flagging posts and stories](#) that appear to be branded but are not disclosed, thereby nudging creators to use these tools to disclose their partnerships.

Similarly, YouTube requires content creators to disclose sponsored videos by [checking a box that says "My video contains paid promotion like a product placement, sponsorship, or endorsement"](#) during the upload process. Videos marked as paid promotions automatically show viewers a disclosure message for 20 seconds at the beginning of the video. Of course, it's hard to know exactly how self-disclosure ad policies are being

enforced across platforms, but TikTok is significantly far behind Instagram and YouTube when it comes to providing tools and enacting clear, strict, and transparent policies.

Providing transparency into advertising (including influencer advertising) on social media platforms is critical. Advertising transparency allows people to monitor what kind of entities are paying to influence people on a platform and can be an important first-warning system for detecting when ads are running on the platform that shouldn't be. Though TikTok has announced [Transparency Centers](#) in the U.S. and Europe, these Centers do not provide detailed transparency regarding advertisements, and does not include specific data about how many or which ads were rejected under TikTok's ban on political advertisements.

## TikTok's political ad policies are easy to evade

Charli D'Amelio promoting sugary Dunkin' Donuts drinks is one thing, but how do TikTok's policies stack up when influencers are paid to promote political messages? Does TikTok consider such messages political advertising?

According to TikTok's [Ad Policy](#), all political ads are banned on the platform, including ads that promote positions on issues of public importance. The platform does permit cause-based ads from nonprofits or government agencies as long as they are "not driven by partisan political motives." However, TikTok [doesn't](#) provide a publicly-searchable database of advertising data as [Facebook/Instagram](#), [Snap](#), and [Google/YouTube](#) do. Without community oversight into advertising, it's difficult to verify how TikTok is enforcing its policies in practice.

TikTok appears to be [testing out a new feature](#) that would allow creators to pay to promote their content to more people on the platform. There do not appear to be any safeguards preventing creators from using this feature to promote paid political messages. It is unclear how TikTok is monitoring this content to ensure that it complies with their political ad policy.

TikTok says that content creators must self-identify any paid content (typically with the hashtag #ad or #sponsored), in keeping with [U.S. Federal Trade Commission \(FTC\) guidelines for the disclosure of paid influence](#). However, influencer ads do not appear to be actively monitored or scrutinized by TikTok, raising concerns around how the platform is enforcing its trust and safety protocols.

For instance, two weeks before the 2020 U.S. Presidential Election [a BBC investigation](#) uncovered dozens of anti-Trump get-out-the-vote TikTok posts in which left-wing

content creators did not disclose they had been paid by the progressive agency Bigtent Creative, which receives funding from Democratic political organizations and non-partisan organizations. When approached by BBC journalists, TikTok took the posts down, but only after the videos had already amassed hundreds of thousands of views.

Building on the BBC investigation, we decided to dig in further. We found that some TikTok political influencers in the U.S. are supported by political organizations, with very little transparency provided about the nature of these relationships.

## Research findings



Our research found that several TikTok influencers in the United States who disseminate political messages on the platform are receiving payment or the promise of compensation from political organizations. In keeping with [FTC guidelines](#), we define payment as any form of material compensation – financial compensation, complimentary gifts, or trips. Some of this funding could be characterized as “dark money” – political spending that aimed at influencing voters, but where the source of the money and/or the donor is not fully disclosed.

Furthermore, we found that TikTok doesn't actively monitor and enforce its rule that influencers disclose paid partnerships, nor does the platform label sponsored posts as

advertising. These inconsistent disclosure practices – paired with zero ad transparency tools or archives – makes it very difficult to monitor political influencer ads on TikTok.

## TikTok doesn't seem to monitor influencer advertising

We started with several research questions, narrowing down to one:

### **Does TikTok allow influencers to post political content that reflects a paid or material relationship with political organizations?**

Secondary questions we had:

- How does TikTok enforce its ban on political advertising?
- How does TikTok enforce its rules for influencer advertising? Are TikTok creators following platform/FTC rules for self-disclosure?
- How does TikTok internally monitor or track influencer advertising?

To get a better understanding of how TikTok labels individual posts and ads, we queried the TikTok API to see the metadata associated with each TikTok post. We used [an unofficial API wrapper](#) created by [David Teather](#), since [TikTok limits its API access](#).

Example code (Date of query: 02/24/2021)

```
api = TikTokApi.get_instance(use_test_endpoints=True)
count = 1000000
tiktoks = api.byHashtag("ad", count=count)
filtered_tiktoks = []

for tiktok in tiktoks:

    # Filter for advertisements
    if tiktok["isAd"] == True:

        # Only add advertisements
        filtered_tiktoks.append(tiktok)
```

Posts with advertiser-funded hashtag challenges (e.g. #CharliXDunkinContest) were marked as advertising in the metadata ("isAd" = True), whereas influencer posts that



used the hashtag #ad or #sponsored were not marked as advertising in the accompanying metadata (“IsAd” = False). The difference is that advertisers must go through TikTok’s ad system in order to run a hashtag challenge or run other kinds of ads, whereas influencer ads are negotiated and transacted off-platform.

Examples of TikTok posts using the #ad hashtag (Date of query: 02/24/2021)

Description	Translation	Date Posted	Is an Ad?
This is why I'm never invited to birthdays 🤔🤔 Enter #Chilisbirthday #contest for a chance to win on their birthday on 3/13 #ad #ChilisBirthday	This is why I'm never invited to birthdays 🤔🤔 Enter #Chilisbirthday #contest for a chance to win on their birthday on 3/13 #ad #ChilisBirthday	2020-03-05 23:0	TRUE

Description	Date Posted	Is an Ad?
Link in my bio just in case you're interested . Discount code: Vanesa10 @scrubdaddy #ad #cleaningtiktok #cleaninghacks #housekeeper #cleanwithme #fy	2021-02-17 21:13:2	FALSE

This is meaningful because it tells us that paid partnerships don’t seem to be marked as ads by TikTok, which makes them more difficult for the platform to monitor. Instead, these ads rely on self-disclosure, which, as our research below shows, isn't very effective. Without a strong system in place to monitor influencer ads on the platform, TikTok could be vulnerable to abuse by political groups and other malicious actors.

## TikTok influencers are not disclosing paid relationships with political groups

Our research found that TikTok influencers across the political spectrum had undisclosed paid relationships with various political organizations in the U.S.

Several right-wing TikTok influencers appear to be funded by conservative organizations like Turning Point USA, a tax-exempt nonprofit which has a dedicated influencer program specifically targeted at funding young conservative content creators on social media.

Turning Point USA’s [website](#) states that it has 280 ambassadors and 11 contributors, with a goal to “saturate social and traditional media markets with the message of freedom and limited government through influencer-based and digital marketing

initiatives.” The program provides ambassadors with “every available tool to successfully spread these ideas on college campuses and beyond.”

We confirmed these details by looking into the organization’s financials: [TPUSA’s 2018 tax filings](#) state that the organization spent \$5.8 million in total on “Other program services,” which includes “Turning Point USA’s influencer media programs.”

<b>4d</b>	Other program services (Describe in Schedule O )			
	(Expenses \$	5,820,975	including grants of \$	441,800 ) (Revenue \$ 2,012 )

**990 Schedule O, Supplemental Information**

Return Reference	Explanation
Form 990, Part III, Line 4d Other Program Services Description	OTHER PROGRAM SERVICES 4 Turning Point USA raises funds for its long-term vitality and special projects, all in furtherance of its tax-exempt purposes Turning Point USA distributed \$6,943,866 to its related entity Turning Point Endowment, which is another 501c3 tax-exempt corporation organized and operated as a Type I supporting organization exclusively for Turning Point USAs benefit OTHER PROGRAM SERVICES 5 Other program services include Turning Point USAs influencer media programs OTHER PROGRAM SERVICES 6 Other program services include Turning Point USAs production programs OTHER PROGRAM SERVICES 7 Other program services include Turning Point USAs distribution programs OTHER PROGRAM SERVICES 8 Turning Point USA distributes grants to nonprofit organizations that pursue efforts furthering Turning Point USAs mission of educating students about the importance of fiscal responsibility, free markets, and capitalism The program awarded \$350,000 to Prager University Foundation and \$15,000 to The Dark Wire

However, TPUSA’s relationship with content creators is not straightforward. While it runs a large network of micro-influencers, some of whom are paid to share or make content, TPUSA representatives [have said](#) that the organization runs “very few official paid partnerships.”

Our research tracks with a September 2020 [investigation from the Washington Post](#) that found that TPUSA was recruiting and paying young people on social media to pump out false messages about voter fraud, the coronavirus, and Joe Biden in order to bolster Trump’s re-election campaign. In this case, young people were paid to engage in spam-like behavior, repeatedly posting the same messages on Twitter and Facebook. While many of those posts were eventually taken down because they violated platform policies on coordinated disinformation campaigns, TPUSA continues to support and fund political influencers.



# #sponsored

## Posts by creators with ties to right-wing political organizations

We found evidence that paid contributors who have formal ties with organizations like Turning Point USA, Prager University, and Today is America post political messages without disclosing details of their financial compensation.

A [POST](#) from @taylormjewett (67k followers)

A [POST](#) from @thepoliticaldropout (5.5k followers)

A [POST](#) from @theisabelbrown (1.6k followers)

Our analysis of TikTok posts found that a number of conservative content creators appear to have been flown out to TPUSA-sponsored conferences and festivals, including a Student Action Summit in West Palm Beach, Florida on December 20, 2020.

A [POST](#) from @joie\_mk\_ (76.5k followers).

“Hi guys, welcome to a day in my life of a political influencer. So I’m an influencer for Turning Point USA and they’re flying me out to West Palm Beach, Florida for the Student Action Summit...Then we got ready for the Influencer reception which Turning Point threw on the roof just for us...”

In the video, the creator identifies herself as a “political influencer for Turning Point USA” and says she was flown out to Florida for the conference. This post does not make clear whether she is receiving further financial support from TPUSA.

A [POST](#) from @alynicolee1126 (234.3k followers).

A [POST](#) from @itsthemandrew (31.1k followers).

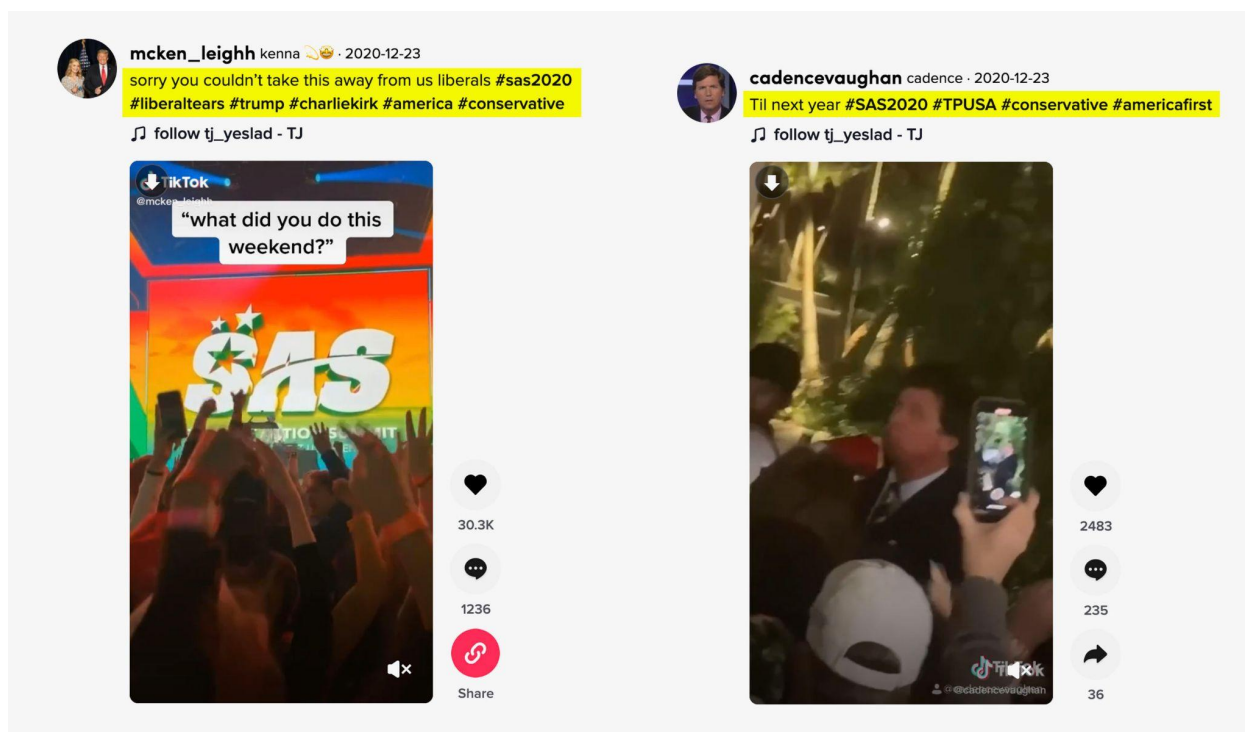
A [POST](#) from @cadencevaughan (31.1k followers).

A [POST](#) from @mcken\_leighh (27.7k followers).

A [POST](#) from @kagchick (8.4k followers).

A [POST](#) from @thepoliticaldropout (5.5k followers).

A [POST](#) from @sophiabfisher (<1k followers).



## Posts by creators with ties to left-wing political organizations

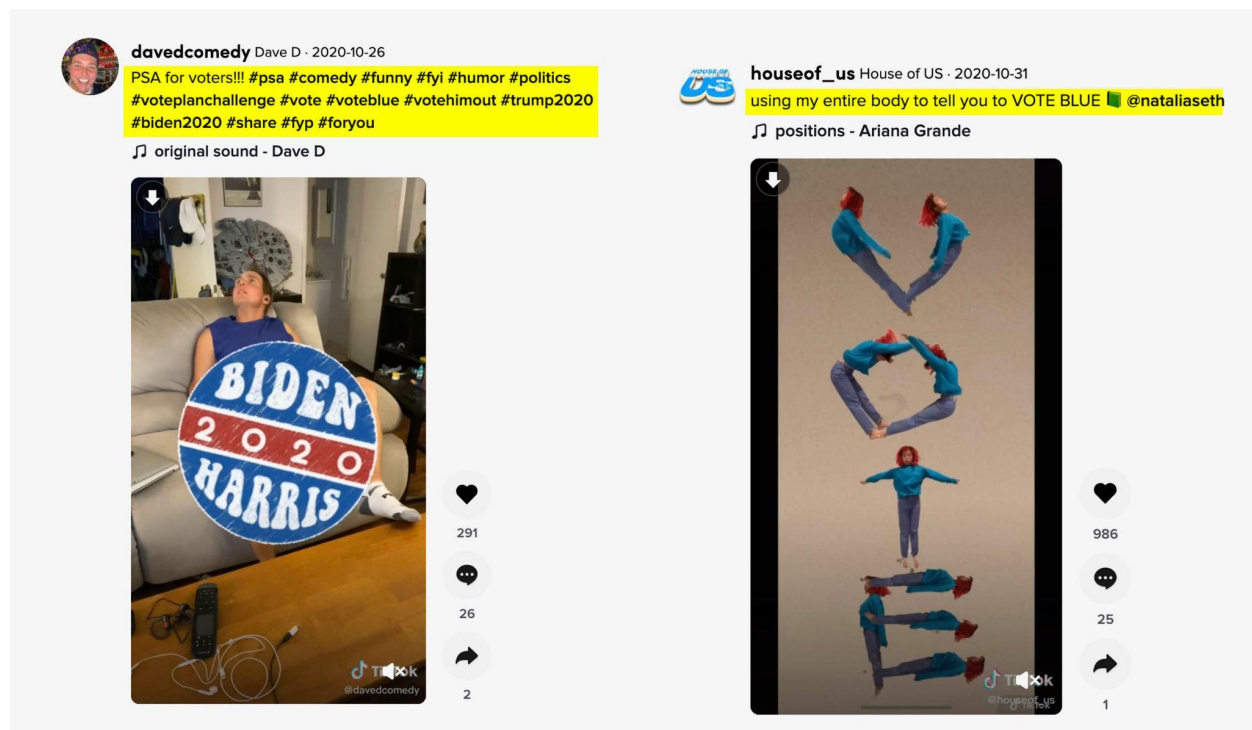
A [2020 Reuters article](#) found that influencers were paid by another progressive PAC, The 99 Problems, to create pro-Biden TikTok posts without using disclaimers like #ad or #sponsored on the posts. While these examples should have violated TikTok's

policies, the fact that they weren't detected suggests that TikTok's self-disclosure rules for influencer advertising aren't very effective.

We found some evidence that progressive influencers supported by left-leaning political organizations were posting pro-Biden messages prior to the U.S. presidential election. For instance, The 99 Problems created and funded the Hype House account [House of US](#), where influencers post political messaging.

A [POST](#) from @houseof\_us (24.5k followers)

A [POST](#) from @davedcomedy (100.1k followers)



## Recommendations

Our research suggests that there is political advertising on TikTok, despite [its policies prohibiting this kind of branded content](#). In practical terms, this means that political advertising on the platform is going unregulated and unmonitored. And combined with an overall lack of transparency into advertising, there is ample opportunity for political influence to happen under the radar on TikTok. Our findings suggest that the undetected political advertising that we've identified on TikTok in the U.S. could easily play out in other countries, and that this is increasingly likely during key political moments like elections or referendums.

### Our recommendations to TikTok

#### Recommendations to TikTok

- 1 Self-disclosure tools:** Develop effective self-disclosure mechanisms for creators to disclose paid partnerships or sponsored content.
- 2 Ad transparency:** Invest in implementing robust advertising transparency on the platform that includes paid or sponsored content.
- 3 Policy enforcement:** Update policies and enforcement processes on political advertisements to ensure that they are inclusive of all ways that paid political influence can happen on the platform.

In order to prevent further abuse of the platform and to increase transparency, TikTok urgently needs to:

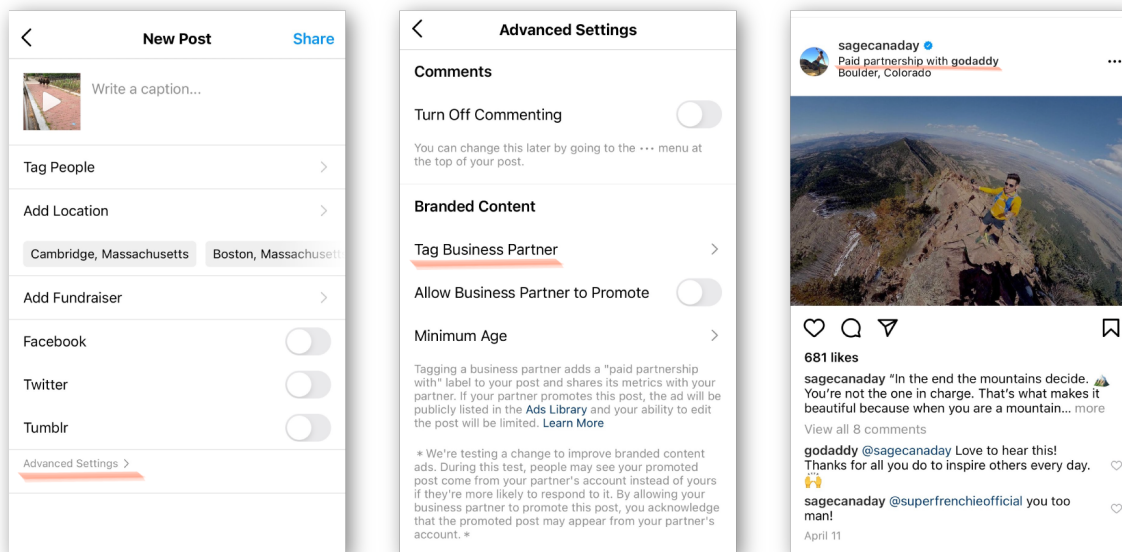
- 1. Develop effective self-disclosure mechanisms for creators to disclose paid partnerships or sponsored content.**

TikTok currently requires creators to use #ad to disclose paid partnerships or sponsored content, which is the minimum required to make the post compliant with [FTC guidelines on endorsements](#). However, the practice has been [called into question](#) for potentially exploiting a loophole in the FTC's guidelines.

TikTok should create a self-disclosure mechanism that enables creators to disclose partnerships and sponsored content at the time of upload, as Instagram/Facebook and YouTube/Google have done. This could serve a useful first step as TikTok works to monitor and track paid content on its platform in order to enforce its policies more effectively. Our analysis of TikTok's post metadata suggests that TikTok isn't currently monitoring branded content in a systematic way; a self-disclosure mechanism could help TikTok develop better processes for tracking branded content systematically.

*Update (6/2/2021): One week prior to this report's release, TikTok created a new branded content policy that includes mention of a ["branded content toggle"](#) to help influencers disclose paid partnerships. We're currently analyzing the feature to learn more, but we're cautiously optimistic that this could be a step in the right direction, especially after we raised these issues directly with TikTok in the course of our research.*

Examples of Instagram's self-disclosure mechanisms.





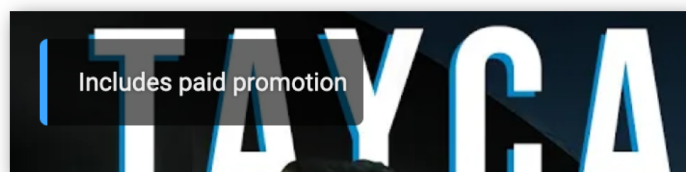
Examples of YouTube's self-disclosure mechanisms.

**Video details**

**Paid promotion**  
If you accepted anything of value from a third party to make your video, you must let us know. We'll show viewers a message that tells them your video contains paid promotion.

☐ My video contains paid promotion like a product placement, sponsorship, or endorsement

By selecting this box, you confirm that the paid promotion follows our ad policies and any applicable laws and regulations. [Learn more](#)



**2. Invest in implementing robust advertising transparency on the platform that includes paid or sponsored content.**

TikTok should develop a publicly-accessible library or repository of all ads, branded content, and promotions running on the platform, as other platforms have done to varying degrees (see: [Facebook Ad Library](#), [Snap Political Ad Library](#), [Google Transparency Report](#)). While these ad databases are [far from perfect](#), they have enabled important public interest research into who is paying to influence political opinion on social media. TikTok should follow Mozilla's [guidelines](#) when designing this repository and ensure that it includes content from all advertisements running on the platform, including paid partnerships and sponsored content that is self-disclosed by content creators.

This will enable community oversight of TikTok's policy enforcement and support independent research into the online political advertising ecosystem. It also aligns with the European Commission's [best practices](#) on political advertising policies from the signatories of the Code of Practice on Disinformation (to which TikTok is a signatory, along with Mozilla).

**3. Update its policies and enforcement processes on political advertisements to ensure that they are inclusive of all ways that paid political influence can happen on the platform.**



TikTok has made the commercial decision to ban political advertisements on its platform. However, that policy will only be effective if it includes all forms of paid political influence on the platform – including branded content – and not just advertisements placed through TikTok’s ad marketplace. As with other types of “banned” content, TikTok should take a risk-based approach to identifying ways that this ban can be easily circumvented and proactively take steps to mitigate that risk.

For example, TikTok is currently testing a [new feature](#) that will allow creators to pay to promote their content, but it’s unclear whether TikTok has considered how the feature could be used to circumvent its ban on political ads. TikTok should assess these risks and develop safeguards before the feature is released.

By improving its capacities to effectively monitor paid content on the platform, implementing robust transparency to enable community oversight, and updating its advertising policies, TikTok could reduce the risk of disinformation and paid political influence on its platform. TikTok could consider enabling this transparency through their recently-opened [Transparency Centers](#) in both the U.S. and Europe—neither of which currently provide detailed transparency into advertisements on TikTok.

## Our recommendations to lawmakers

### Recommendations to lawmakers

- 1**      **Disclosures:** Ramp up disclosure obligations for online advertising.
- 2**      **New forms of advertising:** Design regulations that account for novel forms of political advertising.
- 3**      **Definitions:** Develop a clear and technologically-neutral definition of political advertising.
- 4**      **Transparency:** Develop laws and guidelines requiring platforms to enhance user-facing transparency.

For lawmakers who are interested and concerned with the issues raised in this report, [Mozilla has recently published a series of recommendations](#) in the context of the EU's upcoming regulatory intervention on political advertising. We recommend that lawmakers:

- 1. Ramp up disclosure obligations for online advertising, in line with the mandates outlined in Article 30 of the European Commission's proposed Digital Services Act.**

These obligations should apply to all advertisements running on platforms, with enhanced disclosure obligations for advertisements that are considered 'political', given their special role in and potentially harmful effects on the democratic process and public discourse. Amongst others, [Stiftung Neue Verantwortung](#), the [European Partnership for Democracy](#), and [ourselves](#) have offered ideas on the specifics of such an augmented disclosure regime. For example, this should include more fine-grained information on targeting parameters and methods used by advertisers, audience engagement, ad spend, and other versions of the ad in question that were used for a/b testing.

- 2. Design regulations that account for novel forms of political advertising.**

When defining political advertising, regulators should also include political content that users are paid (i.e. paid influencer content) by political actors to create and promote. Platforms should provide self-disclosure mechanisms for users to indicate these partnerships when they upload content (as [Instagram](#) and [YouTube](#) have done). This self-disclosed political advertising should be labeled as such to end-users and be included in the ad archives maintained by platforms.

- 3. Develop a clear and technologically-neutral definition of political advertising.**

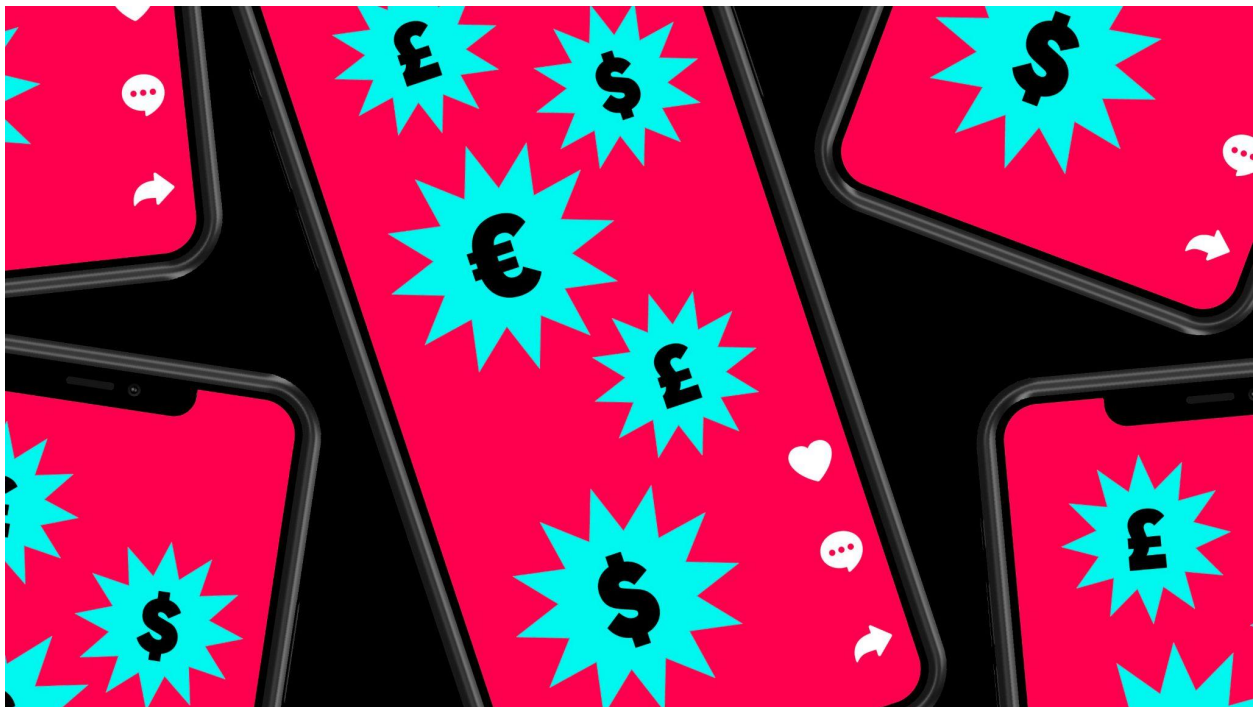
Defining political advertising is a [complicated exercise](#), forcing regulators to draw sharp lines over fuzzy boundaries. Nonetheless, in order to ensure heightened oversight, we need a functional definition of what does and does not constitute political advertising. In coming up with a definition, regulators should engage with experts from civil society, academia, and industry and draw inspiration from "offline" definitions of political advertising.

- 4. Develop laws and guidelines requiring platforms to enhance user-facing transparency.**

Information on political advertising should not only be available via ad archive APIs, but also directly to users as they encounter an advertisement. Such ads should be labeled

in a way that clearly distinguishes them from organic content. Additional information, for example on the sponsor or on why a person was targeted, should be presented in an intelligible manner and either be included in the label or easily accessible from the specific content display. Further, platforms could be obliged to allow third parties to [build tools providing users with new insights](#) about, for instance, how and by whom they are being targeted.

Regulatory proposals that seek to address disinformation and issues surrounding online political advertising must be forward-looking and consider the myriad of ways that paid political influence can happen on social media platforms. In the absence of transparency and meaningful community oversight, “bans” on certain types of content are under-enforced. That is why policymakers must prioritize robust transparency for all online advertisements, coupled with risk-based approaches to policy development and enforcement from online platforms.



## Conclusion

In light of our findings and TikTok's latest moves to allow individual users to pay to promote their content to other people on TikTok, we are concerned that TikTok's political ad policies don't address how paid political influence occurs on the platform. In our research, we uncovered posts from influencers who have clear paid relationships with political groups and promote political messages on TikTok, despite TikTok's policy "banning" political advertisements. Policies like these are only as effective as their enforcement—and in today's fast-changing digital environment, policies can be circumvented as quickly as they are developed. This is why transparency and meaningful community oversight are critical to monitor where enforcement is falling short and where greater attention may be needed.

We urge TikTok to consider our recommendations in order to safeguard against potential harm, especially in light of their rapid growth and relevance to political discourse around the world. At Mozilla, we will continue to monitor paid political influence on platforms like TikTok, especially during heightened moments like elections.

## About the methodology

Our research was primarily conducted in February 2021. We used several different methods in our analysis, employing desk research, technical tools, and qualitative methods to identify paid political influence on TikTok.

First, we analyzed TikTok's policies and public press statements to better understand the platform's rules on advertising. Specifically, we looked at the platform's ban on political advertising and its self-disclosure policies for content creators.

We created a short list of popular political influencer TikTok accounts in the U.S. Using [an API wrapper](#) created by [David Teather](#), we then queried the TikTok API to generate a list of related accounts based on our short list. Next, we reviewed individual TikTok posts from these accounts and identified related hashtags and users to continue adding to our list. We built a small dataset of accounts, users, and TikTok posts to analyze.

From our dataset, we then analyzed each TikTok post's content, including the video, the description, and the metadata. We chose to scrutinize posts that we determined contained political content and potential evidence of a paid partnership. We looked for language that implied the influencer was paid or received some form of compensation, as well as promotion of a political group or messaging.

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