

TOP 10 AD COPY “SIGNALS” THAT INVITE FTC SCRUTINY

These are the 10 universal categories of signals that invite FTC Scrutiny which could lead to deceptive advertising claims.

Signal 1: Result + Time Frame (“Bookend Ad Claims”)

The **big result + specific time frame** that the FTC treats as inherently suspicious.
Examples:

- “I made \$2,174.97 in the last 7 days”
- “Lose 20 lbs. in 30 days”
-  “Lower Your Cholesterol 4% in 6 Weeks”



Signal 2: Images Suggesting Results Aren’t Typical

Images, screenshots that suggest high-achiever, above-average, atypical results.
Examples:

- Image of young man standing beside Mercedes automobile

- Image of business people inside a corporate jet
-  Image of a pile of cash (Click Profit-Founder Craig Emslie featured in ads fanning himself with wads of cash)

Signal 3: AI Claims Suggesting Enhanced Results

Claims that AI produces **predictable, effortless, or universal outcomes**

Examples:

- "AI does the work for you"
- "AI powered"
- "AI-driven"
- "AI machine learning"
-  "#1 AI-Powered web accessibility solution for WCAG compliance" (AccessiBe claimed its widget makes a website fully compliant)

Signal 4: Implied Guarantees

Language creating **certainty**, even by implication without using the word "guarantee."

Examples:

- "Clinically proven"
- "Studies Show"
-  "Extended automobile warranties" & "bumper to bumper" protection (used by American Vehicle Protection Corp. in pitching bogus automobile warranties)

Signal 5: Mechanism-of-Action Claims

Claims that the *system, method, protocol, algorithm, or tech* automatically produces specific results.

Examples:

- “Built-in buyer traffic”
- “Set it and forget it”
- “Algorithm finds clients for you”
- “Done-for-you funnel converts on its own”
-  “Proven system” (used most notably by My Online Business System referred to as “MOBE” in earnings claims)

Signal 6: Transformation Frames

Story formats or visuals implying dramatic personal or financial transformation.

Examples:

- “Zero to six figures” success story
- Extreme weight loss success stories
-  Before/after photos (used by Sensa with unsubstantiated weight lost claims)

Signal 7: No Work / No Skill / No Risk

Claims that success is **effortless, universal, or inevitable**.

Examples:

- “Anyone can do this”
- “No experience needed”
- “Zero risk”
-  “Patented strategy” to make substantial money (used by Online Trading Academy - OTA- in deceptive earnings claims)

Signal 8: “Internet Lifestyle”

Claims relating to the “The 4-Hour Workweek” concept initiated by Tim Ferriss in his best-selling book by the same title. Aspirational claims relating to the “dream” of setting up automated processes that do all the work for you.

- “The 4-Hour Work Week”
- “Work from anywhere, anytime”
-  “Internet Lifestyle” (used by Vemma for marketing its Internet Lifestyle Network affiliate marketing membership which the FTC alleged was an illegal pyramid scheme)

Signal 9: Financial Independence

Aspirational claims relating to the “dream” of becoming independently wealthy (implied earnings claims even if no numbers are mentioned).

- “Generational Wealth”
- “Wealthbuilding”
- “Financial Freedom”
-  The reason the FTC is triggered by these aspirational claims has nothing to do with the words themselves. It’s about net impression, context, and what the FTC has found in past enforcement actions. The FTC has decades of enforcement actions linking these terms to deceptive earnings claims.

Signal 10: “Your Results May Vary” Disclaimers

 The “Results May Vary” disclaimer also known as a “safe harbor” was banned by the FTC in the 2009 Endorsement Guides for specific-result and atypical result claims. Use of this disclaimer alone will signal that the marketer is engaged in deceptive marketing practices.

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