

Purpose

This model policy is designed to ensure that all marketing and promotional activities involving consumer reviews and testimonials about our company comply with the Federal Trade Commission (FTC) rule under 16 CFR Part 465. This rule aims to prevent deceptive practices related to consumer reviews and testimonials, especially in social media and other online fora, thereby protecting potential residents and maintaining the integrity of our business practices.

Scope and Application

This policy applies to all employees, management, marketing teams, and any third-party vendors involved in the management, collection, or use of consumer reviews and testimonials for our properties. It covers all platforms, including our website, social media, and third-party review sites.

Key Compliance Requirements

1. Prohibition of Fake Reviews and Testimonials

- **No Fake Reviews:** Under no circumstances should any employee or third party create, purchase, or solicit fake reviews or testimonials. Reviews from a renter about their experience with a property, for example, must be from actual residents who have lived in or are currently living at the property. This also includes AI-generated reviews and any reviews purchased from third parties.
- **Truthful Testimonials:** Testimonials must accurately reflect the genuine opinions and experiences of the residents. Any exaggeration, fabrication, or misrepresentation is strictly prohibited.

2. Transparency in Material Connections

- **Incentives for Reviews:** A review by a current or former resident may be solicited, including by compensation or incentives (i.e. raffle, prize award, etc. in property campaign), as long as it is not conditioned on a particular sentiment, such as a positive or negative review. Reviewers receiving incentives, such as reward points or participating in a raffle, to post a review should disclose this fact. Additionally, if an employee shares or reposts a resident's review, the employee is not required to disclose its relationship.
- **Disclosure of Relationships:** If a review or testimonial is provided by an insider, such as a property manager, employee, or their relatives, this relationship must be clearly disclosed. Reviews from insiders without proper disclosure are considered deceptive under FTC rules.
- **Third-Party Endorsements:** Any third-party endorsements or testimonials, including those from influencers, must also disclose any material connections, such as compensation or incentives provided for the review.

3. No Review Manipulation or Suppression

- **Display of Reviews:** All collected reviews, both positive and negative, must be treated fairly. Suppressing or selectively displaying only favorable reviews is prohibited. It is also prohibited to claim that a company-controlled review website is independent.
- **Legal and Physical Threats:** Employees are prohibited from using threats of legal action or any form of intimidation to remove or alter negative reviews.

4. Responsible Use of Social Media Influence

- **No Fake Followers or Likes:** The purchase or use of fake social media indicators (such as fake followers or AI-generated like) to enhance our online presence is prohibited. All social media engagement must be organic and reflect genuine resident interactions.

Implementation and Enforcement

- **Training:** All relevant staff will receive routine training on these guidelines to ensure understanding and compliance.
- **Monitoring:** Regular audits will be conducted to monitor compliance with this policy.
- **Consequences:** Non-compliance with this policy by an employee or agent may result in disciplinary action, including, but not limited to, termination and legal consequences.

Conclusion

By adhering to these guidelines, our firm commits to ethical social media marketing practices for our properties that align with FTC regulations, fostering trust and transparency with current and potential residents.

Legal Disclaimers

The information contained in this document is for general interest and informational purposes only and is not intended to constitute specific legal, commercial or other professional advice. It should not be relied on or treated as a substitute for specific advice relevant to particular circumstances. While we seek to ensure that the contents are not misleading or outdated, you should obtain specific legal advice before making or refraining from making any business or personal decisions.

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