IMOD / CALL OUT FILE 002 / PUBLIC CUT

DISCLOSURE BRIEFING - SEPTEMBER 12, 2026

The Freebie and the Fine Print

DeAsha Green & Kinya Claiborne - Possible #Ad disclosure gaps (Virgin Voyages)

Caption review of two public-facing creator posts around a free Virgin/TikTok creator cruise and an affiliate booking link. Possible disclosure-gap framing only.

DISCLAIMER (PAGE 1): Not legal advice. Personal opinion and commentary for adults 21+. Not a finding of liability / not a legal finding. Not a government action. Not an FTC case, complaint, or consent order. No affiliation with Virgin Voyages, TikTok, or any named brand. No harassment CTA. Public posts only. This is caption review / possible-gap analysis - not a claim that either creator violated the FTC Act as fact.

International Man of Degeneracy (theimod.com) commentary. Handles reviewed: @allofdeasha / @kinyaclaiborne. Public caption quotes and public post URLs only.

Snapshot - File 01 / File 02

File 01 - DeAsha Green (@allofdeasha)

Public posts describing an invite to the Virgin x TikTok Creator Voyage (April 19-22, 2026), complimentary cabin framing, food/Bimini reviews, and hashtags such as #sailingwithvirgin / #virginvoyages. Caption review question: whether those captions include a hard-to-miss #ad / #gifted / #sponsored label under FTC Disclosures 101 guidance.

File 02 - Kinya Claiborne (@kinyaclaiborne)

Public Instagram caption inviting followers on a 7-night Mexican Riviera sailing with virginvoyages.sjv.io booking link plus access code SEPTSOCIAL (discount + up to $200 Sailor Loot). Caption review question: whether #ad / #affiliate / Paid Partnership language appears in the published caption alongside that affiliate-style URL.

How to read this

This is a public-record review of feed captions. We cannot see Instagram Stories, every on-screen graphic, or whether a Paid Partnership toggle was switched on. The claim is narrower: on the published captions cited below, clear-and-conspicuous ad labels appear thin or absent relative to FTC Disclosures 101 and Endorsement Guides material-connection examples. Possible gap framing - not a legal finding.

What the public record shows (possible gaps)

The April 2026 trip was framed by industry coverage as complimentary creator inventory. Virgin Voyages and TikTok put 1,100+ creators and plus-ones on Scarlet Lady for a three-night Miami-Bimini sailing, 19-22 April 2026. Industry coverage priced a comparable Sea Terrace around $1,500 per person. The brand called it a creator activation; content was the point.

DeAsha publicly said she was invited. On 19 April she posted that @Virgin Voyages and @TikTok invited her on their first CREATORS CRUISE. On camera she called it a brand trip and noted cabin gifts. Follow-up posts reviewed food and told people what they "have to order." Hashtags reviewed: #sailingwithvirgin #virginvoyages. No #ad, #gifted, or #sponsored observed in those captions.

Kinya posted a tracking-style link and a loot code. On 4 September 2026 she invited followers on a 7-night Mexican Riviera sailing and wrote to book through virginvoyages.sjv.io/kinya plus access code SEPTSOCIAL for a discount and up to $200 Sailor Loot. Caption hashtags reviewed do not include #ad, #affiliate, or #sponsored. That URL pattern is consistent with affiliate tracking domains (ShareASale / Impact-style) used for commission booking links - commentary on public URL structure, not a private ledger.

Virgin's own creators page publicly sells an Affiliate Program ("turn your content into commission," custom tracking links) and Cabin for Content ("selected creators sail with us in exchange for high-quality storytelling"). The commercial framing is public on the brand side; the caption-label question is whether each post makes that connection hard to miss for a stranger.

FTC Disclosures 101: a free trip is a classic material-connection example; "thanks" and campaign hashtags are generally not enough; the label should be hard to miss. UK ASA's May 2026 travel sweep (useful parallel, not U.S. law) found many travel influencer ads with weak or missing disclosure. Rules cited as context for caption review - not a determination that these two creators violated the FTC Act.

File 01 · DeAsha Green - caption review

HANDLE	@allofdeasha · TikTok / Instagram
AUDIENCE	TikTok ~11.4K followers · Atlanta lifestyle / food / getaways (public counts move)
CONNECTION	Complimentary Virgin x TikTok Creator Voyage, Scarlet Lady, 19-22 Apr 2026 (public invite framing)

Why the invite matters for disclosure analysis: Skift's headline on the sailing was "Why Virgin Voyages Gave 1,100 TikTokers a Free Cruise." Karryon reported creators sailed complimentary with plus-ones. Ad Age named @allofdeasha in its photo caption for the activation. Retail value for a comparable three-night Sea Terrace sits around $1,500 a head before the guest. Under Endorsement Guides examples, free travel is a material connection worth clear labeling when the post sells the product.

What she posted (public reconstructions)

> *"Pinch me! @Virgin Voyages & @TikTok invited me to go on their very first CREATORS CRUISE!"*
> - @allofdeasha, TikTok 7630628328763936013, 19 Apr 2026 · spoken: first brand trip. Hashtags: #sailingwithvirgin #virginvoyages. No #ad / #gifted / #sponsored observed in caption.

20 Apr 2026 · TikTok 7630883852789042446 - Day-one sailing recap. Food "BY FAR sooooo good." On camera: "they left some of the cutest gifts" in the cabin. Same two hashtags. No ad label observed.

26 Apr 2026 · TikTok 7633090859512237325 - Bimini Beach Club review with a menu list and "you have to order." Closes: "I can't wait to sail with Virgin Voyages again." Same two hashtags. No ad label observed.

~1 May 2026 · IG reel DXzgGJBtg2Z - The Wake restaurant review. Dinner rolls "non-negotiable," lamb chops "a MUST," "now I completely understand the hype." #sailingwithvirgin #virginvoyages. No ad label observed.

Caption-review notes (File 01)

- She used the words invited, creators cruise, and brand trip in public speech/captions - useful context, but Disclosures 101 still prefers a hard-to-miss label a stranger recognizes as an ad.
- #sailingwithvirgin is a campaign-style tag. It may tell other creators which pile to join; it does not clearly tell a follower "this cabin was free."
- FTC Disclosures 101: do not rely on stand-alone "thanks," do not hide the label in a hashtag pile, do not leave it for the end or a profile page. A free cruise is "anything of value."
- Mid-tier reach is not a defense under the Guides' consumer-expectation test. Possible gap framing only.

File 02 · Kinya Claiborne - caption review

HANDLE	@kinyaclaiborne · Instagram / TikTok
WHO	Founder, STYLE & SOCIETY · LA fashion / travel creator (public bio framing)
REACH	230k+ IG reported · historic partners publicly associated: Revolve, Ipsy, Vons
BRAND TIE	Featured on Virgin Voyages' own TikTok, Black History Month 2026 (public)

Exhibit - 4 September 2026 Instagram

Public URL: instagram.com/kinyaclaiborne/p/Dc6S8gNmlso/

> *"Come sail with me! I'm heading back to sea with Virgin Voyages for a 7-day Mexican Riviera cruise, September 19-26, sailing roundtrip from Long Beach - and I'd love for you to join me! Use access code SEPTSOCIAL to receive a discount + up to $200 in Sailor Loot. Book through my exclusive link: virginvoyages.sjv.io/kinya"*
>
> - @kinyaclaiborne, Instagram, 4 Sep 2026. Hashtags observed: #VirginVoyages #CruiseWithMe #MexicanRiviera #CruiseLife #TravelWithKinya. Missing from that list in the published caption: #ad, #affiliate, #sponsored, #partner, Paid Partnership.

Why the URL matters for caption review: virginvoyages.sjv.io is publicly consistent with ShareASale / Impact-style affiliate tracking domains. "Exclusive link" plus a personal access code is how many creator affiliate offers are structured. Virgin's own site advertises turning content into commission and custom tracking links. Commerce language in the caption without a hard-to-miss #ad / #affiliate line is the possible gap - not a private payment confirmation.

Related public posts (pattern, not a second dossier)

- 5 July 2026 IG (p/Daa6MEomjeQ): spa-at-sea "favorite port of call" aboard @virginvoyages. Lifestyle framing. No #ad / #gifted observed in caption review.
- 17 June 2026 reel listed in Modash's Virgin Voyages sponsored-content library: Brilliant Lady maiden Panama Canal sailing, ~30.7k plays. Snippet review showed no #ad; same library shows other creators on the brand using #ad.
- Virgin Voyages featured her on its official TikTok as a ship-as-runway creator - a public brand relationship signal, not a random guest.

Sailing she was selling (public offer): Brilliant Lady, 7 nights, Long Beach roundtrip, 19-26 September 2026, Mexican Riviera. Public cabin prices around this window started near $1,666 (was $2,330) per sailor. Her offer stacked a personal code for a discount plus up to $200 Sailor Loot.

What a clearer caption often looks like (guidance context)

- Start with #ad or #affiliate - not after four lifestyle hashtags.
- Say the commercial fact in English: "I earn commission if you book with this link."
- If the sailing itself was gifted or discounted, say that too. Two connections, two sentences.
- Do not hide the label behind "exclusive," "join me," or a campaign tag alone.

Rules context (not a liability finding)

FTC - United States (Disclosures 101 / 16 CFR Section 255.5 framing): A material connection includes a financial relationship such as the brand paying you or giving free or discounted products or services. Financial relationships aren't limited to money - disclose if you got anything of value to mention a product. If a brand gives free or discounted products or other perks and then you mention one of its products, make a disclosure even if you weren't asked to mention that product. Don't mix disclosure into a group of hashtags or links. Don't use stand-alone terms like "thanks" or "ambassador." Disclosures are likely to be missed if they appear only at the end of posts or videos, or anywhere that requires a person to click MORE.

ASA / CAP - United Kingdom, useful parallel only: May 2026 travel-influencer snapshot reported 531 posts; 20% adequately disclosed; 11% weak labels; 69% no disclosure. A free trip is treated as payment in that guidance. Acceptable labels cited there include #ad, Advert, Paid Partnership.

Virgin Voyages - their own public words: Affiliate program - "Turn your Virgin Voyages content into commission," custom tracking links, exclusive offers. Cabin for Content - "Beyond gifted trips. Real partnership." "Selected creators sail with us in exchange for high-quality storytelling that reflects the spirit of our brand."

Caption patterns reviewed vs. Guides preferences

- Used: #sailingwithvirgin | Guides often prefer: #ad or Paid partnership
- Used: "invited me" buried in a gush | Prefer: hard-to-miss label at the start
- Used: virginvoyages.sjv.io + SEPTSOCIAL | Prefer: #affiliate / "I earn a commission"
- Used: "Come sail with me!" | Prefer: the commercial fact, in English

Sources · caveats

DeAsha Green posts (public): tiktok.com/@allofdeasha/video/7630628328763936013 · /7630883852789042446 · /7633090859512237325 · instagram.com/allofdeasha/reel/DXzgGJBtg2Z/

Kinya Claiborne posts (public): instagram.com/kinyaclaiborne/p/Dc6S8gNmlso/ · instagram.com/p/Daa6MEomjeQ/ · Modash Virgin Voyages sponsored library, 17 Jun 2026 reel

The sailing: Virgin Voyages press release, 16 Apr 2026, "Largest Creator Cruise." Skift, 27 Apr 2026, "Why Virgin Voyages Gave 1,100 TikTokers a Free Cruise." Karryon, 1 May 2026. Ad Age, 29 Apr 2026.

Brand programs: virginvoyages.com/creators - Affiliate Program and Cabin for Content. Rules: FTC, Disclosures 101 for Social Media Influencers; 16 CFR Section 255.5; ASA Snapshot Report on travel influencer disclosure, May 2026. Identity/audience: public TikTok profile @allofdeasha; Tribe Dynamics creator spotlight on Claiborne (2022); Virgin Voyages official TikTok featuring Claiborne, Black History Month 2026.

What this briefing is not

- Not a lawsuit, not an FTC complaint, not a claim that either woman is a criminal. Advertising rules are civil.
- Not a complete audit of Stories, live audio, or platform-native Paid Partnership flags we cannot see.
- Not a claim that every creator on the April 2026 sailing failed. Some peers used #ad. These two, on the posts cited, appear thin on labels in the published captions.
- Captions can be edited after the fact. The versions quoted were the public text available at review.
- Not a full personal dossier. Private emails, phones, addresses, DOB, family names, and management contacts are omitted if present in any source materials.
- Not a finding that either creator violated the FTC Act. Possible / caption-review framing only.

Bottom line (opinion)

Virgin handed out cabins and tracking-link programs in public. DeAsha Green told the camera she was invited, then reviewed the product under a campaign hashtag. Kinya Claiborne posted a commission-style URL and a loot code in a booking pitch. On the captions cited, neither post leads with the plain-language ad label Disclosures 101 already describes. That is a possible disclosure gap worth noting in commentary - not a legal finding, not an FTC case, and not a call to harass anyone.

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