The Trading Coach Ad Compliance Checklist

The pre-launch audit our team runs on every trading coach campaign — 7 sections, 42 pattern triggers, one structural fix each. Covers courses, mentorships, communities, and signal services.

What's inside

How to use this checklist

Run this audit before every new campaign launch and quarterly against your live account. Each row lists a pattern trigger — the failure mode we watch — paired with its structural fix. Not every pattern applies to every program; use the sections that match your product mix (course, mentorship, community, or signal service).

SECTION 1

Testimonial and results-based claim audit

Testimonial claims are the single most-enforced surface in trading education — because the FTC treats a student result as an implied representation of what other buyers can expect.

#	PATTERN TRIGGER	STRUCTURAL FIX
01	Standout student results shown without a typicality disclaimer or context on how common the result actually is.	Add cohort context inline: "among students who completed the full 12-week program." FTC guidance requires typicality context in the same visual block as the standout claim, not in a separate disclaimer page.
02	"Results not typical" fine print used to defend an atypical hero result.	Cut the atypical result as the hero. Regulators (FTC in the US, ASA in the UK) have explicitly stated that a small-text disclaimer does not cure a misleading typical-outcome implication in the ad's main claim.
03	Student result shown for the single best week or month with no timeframe context.	Show the student's actual timeframe: months in the program, prior experience, capital deployed. "Made $47k this month" becomes "Made $47k in month 8 after starting with $50k in month 1."
04	Testimonial quotes with no name, no verification path, and no method for a viewer to check whether the student is real.	Every testimonial links to a verifiable identity: LinkedIn, video interview, or a case study page with contact-verified attribution. FTC and platform reviewers look for this exact pattern.
05	Students who received compensation, free access, or affiliate revenue used as testimonials without disclosure.	Disclose the material connection in the same visual block as the testimonial: "[Student] received free access to the program in exchange for this review." Required under FTC 16 CFR Part 255.
06	Screenshots of before/after account balances used as social proof.	Substitute with process artifacts — the student's trade journal, the strategy framework they applied, screenshots of platform use. Removes the implied income-outcome guarantee.

SECTION 2

Earnings representation and income claim audit

Earnings claims about what a student can make from the program are subject to the FTC's Business Opportunity Rule, MLM guidance, and state-level income-claim statutes — even when the program is sold as "education."

#	PATTERN TRIGGER	STRUCTURAL FIX
01	Headline references a specific dollar figure a student will earn (e.g. "How our students make $15k/month").	Reframe as methodology description: "The framework our top students use to structure their trading." Removes the income-claim classifier trigger while keeping the aspirational hook.
02	"Replace your salary," "quit your day job," or "live off your trading" language.	Cut entirely. This is the archetypal FTC-enforced income claim in trading education. Substitute with skill-acquisition framing: "Learn the same setup our top students use."
03	"Guaranteed profitable" or "guaranteed returns" language attached to the program.	Remove all guarantee language associated with trading outcomes. Guarantees can attach only to program deliverables (module access, coaching hours, refund policy) — never to trader results.
04	"Make X in Y days" framing tied to the program's duration.	Cut. This is the single most-flagged phrasing on Meta and TikTok for financial-education ads. Reframe around skill milestones: "By week 4, students can identify [specific setup] on their own charts."
05	"Our students average 10% monthly returns" or similar aggregate-return claims.	Aggregate return claims require substantiation matching FTC standards: verified data, disclosed methodology, and typicality context. In practice: drop these entirely unless the substantiation exists.
06	Any earnings-related claim without a matched risk-of-loss disclosure.	Every earnings reference is paired with a risk-of-loss statement in the same visual block. "Trading involves risk of loss" is the minimum baseline; more specific disclosure is preferred where the platform allows.

SECTION 3

Expertise and credential claim audit

The coach's own claims about their track record and background are treated by regulators and platforms as the foundational representation of the entire program's value.

#	PATTERN TRIGGER	STRUCTURAL FIX
01	"$X in profits" or "multi-million dollar trader" claims about the coach with no verifiable track record.	Substantiate the claim with brokerage statements, verified track record from a service like Kinfo or Myfxbook, or drop the specific number. Unsubstantiated coach-track-record claims are the fastest ad-account termination trigger in this vertical.
02	Years-of-experience claims that count from paper-trading or study, not actual capital-at-risk trading.	Define what counts as trading experience in the ad or landing page: "12 years trading a live account" is materially different from "12 years studying markets." The FTC has specifically called out this distinction.
03	"Wall Street background," "prop firm trader," or "institutional experience" language without a verifiable prior employer.	Name the specific firms and roles. Unverifiable professional-background claims are the highest-risk credential pattern; specific verifiable claims are protective, not risky.
04	"As seen on" logos (CNBC, Bloomberg, Yahoo Finance) that reference paid press releases or aggregator republishing.	Distinguish paid placement from editorial coverage. If the coverage is a paid press release, remove the logo entirely; if it's aggregator republishing of a paid PR, same. Only genuine editorial coverage qualifies.
05	Self-issued certifications, self-branded designations, or made-up credentials ("Certified Master Trader") implying external authority.	Drop self-issued credentials that mimic real designations. If a real credential exists (CFA, CMT, Series 65), name the actual issuer. Made-up credentials are per-se deceptive under FTC guidance.
06	Testimonials from other coaches or influencers presented as expert endorsements without disclosing cross-promotion arrangements.	Disclose any cross-promotion, JV, or affiliate relationship in the same block as the endorsement. Cross-endorsement without disclosure is a per-se FTC Endorsement Guides violation.

SECTION 4

Course and mentorship offer framing audit

How the program itself is framed — price, refund policy, urgency — is where platform review and consumer-protection enforcement most frequently intersect.

#	PATTERN TRIGGER	STRUCTURAL FIX
01	"Only 5 spots left," "doors close tonight," or countdown timers where the underlying offer restarts weekly.	Cut synthetic urgency entirely. Real cohort-based programs can disclose cohort start dates without fake scarcity; evergreen programs stop pretending they're cohort-based.
02	"30-day money-back guarantee" without the actual conditions disclosed (proof of module completion, coaching call attendance, etc.).	Disclose refund conditions in the same visual block as the guarantee claim. If the refund requires proof of engagement, say so upfront. Hidden refund conditions are a top consumer-complaint category.
03	Recurring subscription (monthly community, ongoing mentorship) presented as a one-time payment.	State the recurring nature prominently, matching the FTC's Negative Option Rule requirements: total commitment, billing frequency, and cancellation method — all in the same visual block as the price.
04	$5,000 or $10,000 stated as the "real price" to make the actual $997 offer look like a discount, with no evidence anyone has ever paid the higher price.	Drop reference-price anchoring entirely, or substantiate the reference price with actual sale history. Fake reference prices are directly prohibited under both FTC and state price-anchor rules.
05	Ad promises a "free strategy call" that turns into a $10k program pitch, with the program price never mentioned in the ad.	Disclose in the ad copy that the call includes a program offer. Concealed high-ticket sales calls are one of the most-enforced patterns in FTC info-product actions.
06	Signup is one-click but cancellation requires email, phone, or scheduled call.	Match cancellation friction to signup friction. FTC's "Click to Cancel" rule (finalized 2024) directly targets this asymmetry across all subscription products.

SECTION 5

Community and signal-service framing audit

Signal rooms, Discord communities, and "trade with us" services carry investment-adviser-registration risk on top of standard info-product enforcement — because a paid signal service can qualify as investment advice under the Advisers Act.

#	PATTERN TRIGGER	STRUCTURAL FIX
01	Paid signal service marketed with "follow my trades" or "trade what I trade" language.	Reframe as educational signal — "see how a discretionary trader thinks about setups" — and add a disclaimer that signals are not personalized investment advice. In the US, verify whether the service triggers Investment Adviser Act registration.
02	Signal service claims a win rate or return without third-party track-record verification.	Publish verified track record via a broker-linked service (Myfxbook, Kinfo, TradingView) or drop the win-rate claim. Unverified signal-service performance claims are heavily litigated.
03	Live trading room testimonials that imply room members achieved the same result the room host achieved.	Distinguish room-host results from member results. Room-host trading a different account size, timeframe, or strategy from members needs to be disclosed in ad copy referencing the room.
04	"Copy my trades in real time" language when the service is actually delayed alerts, not synchronous copy-trading.	Describe the actual mechanic. "Delayed trade alerts within 5 minutes" is legal, honest, and defensible. "Copy my trades" implies a regulated copy-trading platform, which is a distinct regulatory category.
05	Discord or Telegram community sold as "1-on-1 mentorship" when access is actually group chat.	Describe the actual access model: group chat, weekly office hours, async Q&A.; Overselling access modality is a top refund-request driver and a persistent enforcement pattern.
06	Signal service with a large following exits positions before signaling members ("pump-and-signal").	This is a structural business-model problem, not a copy fix. Signal services must publish a clear execution-order policy: whether the host trades before signals, after signals, or simultaneously. Undisclosed front-running is a securities violation regardless of program framing.

SECTION 6

Platform-policy alignment audit

Trading coach ads run across Meta, TikTok, YouTube, Google, and (increasingly) X — each platform has distinct financial-services policies that route trading-education content differently, and creative approved on one platform routinely fails on another.

#	PATTERN TRIGGER	STRUCTURAL FIX
01	Ad uses Meta's standard financial-services templates without checking the current version of the Financial Products & Services policy.	Version-check the policy before every launch. Meta's financial-services policy has changed materially three times since 2023; templates from earlier launches routinely fail current review.
02	TikTok organic content and TikTok paid ads use the same script — but paid ads fall under stricter Restricted Industry review.	Rewrite paid-ad versions to remove specific income claims, testimonial-heavy formats, and urgency framing. TikTok organic can survive framing that TikTok paid ads cannot.
03	YouTube ads for financial coaching content without YouTube's Financial Products & Services verification.	Complete the verification before running ads — YouTube requires proof of relevant licensing or educational-only positioning. Running unverified ads gets the channel demonetized alongside the ad account.
04	Google Ads targeting "day trader" or "forex trader" audiences without checking Google's personalized-financial-advice restrictions.	Verify audience targeting against Google's current Financial Products & Services policy. Personalization based on financial-outcome expectations is progressively restricted year-over-year.
05	Assuming X (Twitter) Ads' looser financial-services policy makes previously-rejected creative safe to run.	X's policies are less restrictive but not exempt — and X's enforcement is retroactive. Creative that would fail Meta review often gets pulled from X after 2-4 weeks of running. Design for Meta compliance and run everywhere.
06	Paid influencer or affiliate campaigns run without the platform's specific influencer-disclosure requirements built into the brief.	Include platform-specific disclosure requirements in every influencer brief. #ad and #sponsored placement varies by platform; TikTok requires the Branded Content Toggle, YouTube requires the paid-promotion tag. Missing disclosures make the coach jointly liable with the influencer.

SECTION 7

Outline-stage compliance review workflow

The workflow that catches these patterns before creative production starts — because retroactive review of shot footage is substantially more expensive than outline-stage review.

#	PATTERN TRIGGER	STRUCTURAL FIX
01	Compliance review happens after creative is filmed or designed.	Move review to outline stage — before production begins. Every reviewed outline is documented for the audit trail.
02	One reviewer signs off on all compliance decisions.	Two-reviewer structure: strategy lead + compliance lead. Consensus required. For trading coaches specifically, add a legal-review escalation path for any claim referencing specific dollar figures or track records.
03	Each new campaign is reviewed from scratch with no precedent database.	Build a decisions log — every accepted and rejected framing pattern, with the reasoning and the underlying FTC guidance or platform policy cited. Compounds review speed over time.
04	Reviewing against a static policy document that hasn't been updated since the last FTC guidance revision.	Subscribe to FTC and state-AG enforcement feeds. Version the internal policy monthly. Trading education is a persistent FTC target; enforcement updates translate directly into ad-review changes.
05	No post-flight audit of what actually shipped vs. what was approved.	Weekly audit sampling 10% of shipped creative. Discrepancies are structural process issues, not one-off mistakes.
06	Affiliates, JV partners, and student-ambassadors ship promotional creative directly without compliance loop.	Affiliates and JV partners submit through the same outline-review workflow. This is the highest-risk shipping path in trading education — affiliate misrepresentations create direct FTC exposure for the coach, not just the affiliate.

NEXT STEP

See where these patterns are firing on your account.

This checklist tells you what to look for. A 45-minute strategy call tells you what's already firing on your ad account, which fixes to prioritize, and what a compliance-tested launch looks like for your specific program and platform mix.

Book your free 45-minute strategy session — propaxio.com/book-a-call