Signal Intelligence
CREATOR RISK INTELLIGENCE
Issue 27 · March 2026

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The Signal

Monthly intelligence on Creator Risk, regulatory change, and brand safety incidents. Issue 27 · March 2026

Each month Signal Intelligence monitors the Creator Risk Landscape across all major markets. The Signal distils what matters — real incidents, regulatory shifts, and the patterns forming before they become headlines. No scores. No dashboards. Just the intelligence that protects brand partnerships.

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01 — THE MOST EXPENSIVE DUE DILIGENCE FAILURE OF 2026

Taylor Frankie Paul · ABC / Disney · March 2026

Every risk professional in the Creator Risk Landscape should study what happened to ABC in March 2026. It is among the clearest demonstrations in years of what due diligence failure can cost — and why the signals that matter are rarely in the content feed.

What happened

In September 2025, ABC announced Taylor Frankie Paul — star of Hulu's Secret Lives of Mormon Wives — as the lead of The Bachelorette Season 22. It was a franchise first: a lead who had never appeared on The Bachelor. Production completed. Marketing launched. ABC ran Bachelorette promotion during March Madness. On 19 March 2026 — three days before the season premiere — TMZ published a 2023 video showing Paul throwing chairs and placing her ex-partner in a headlock while her five-year-old daughter watched and cried. Disney cancelled the entire season the same day.

What was already on the public record

Feb 2023	Paul arrested in Herriman, Utah — charged with felony aggravated assault, domestic violence in presence of a child, child abuse with injury.
Aug 2023	Paul pleads guilty to third-degree felony aggravated assault. Plea held in abeyance for three years.
Sep 2025	ABC announces Paul as The Bachelorette on the Call Her Daddy podcast. The 2023 arrest and guilty plea are on public record at this point.

Mar 2026	TMZ publishes the 2023 assault video. Cinnabon and Meta terminate brand partnerships within 48 hours. Disney cancels the season three days before premiere.

ESTIMATED FINANCIAL EXPOSURE TO ABC / DISNEY

Season production (filming, crew, post-production): $30–40M · Marketing and promotion including March Madness: $5–10M · Lost advertising revenue (22 episodes unaired): $20–30M · Brand partnership losses (Cinnabon, Meta): $2–5M · Total potential exposure: tens of millions of dollars across a cancelled production, a withdrawn campaign, and terminated partnerships. Figures are Signal Intelligence estimates based on industry benchmarks — not confirmed by ABC or Disney.

The Signal Intelligence lesson

Paul's content score would have been strong. Her content was clean (Content Risk: 96/100 per independent analysis). Her audience was real (Authenticity: 95/100). Standard platform-based vetting — the kind most brands do — would have returned a positive result. The risk was not in her content. It was in her legal record, in court documents that have been public since 2023, and in audience sentiment data showing her followers were already discussing the arrest in her comment sections.

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A strong content score is not a safe creator. The gap between what platform data shows and what public record contains is where Creator Risk incidents happen. Paul's arrest, charges and guilty plea were available to any researcher with access to Utah court records. The signal was always there. It does not appear to have formed part of the decision-making process.

RECOMMENDED ACTION

Before activating any creator for a major partnership — particularly ambassador or long-term deals — conduct a public record check beyond social media. Court records, legal databases and news archives are publicly accessible. For partnerships of significant value, consider a portfolio-level due diligence review that covers the full public record — not just the content feed.

02 — WHEN CONTENT SCORES LIE

Scotty K Fitness · Ryse Supplement Co. · January 2026

A fitness creator with a clean content history was dropped by his supplement sponsor in January 2026 — not because of what he posted, but because of how he responded to a comment.

What happened

Scotty K Fitness, a fitness content creator sponsored by supplement brand Ryse, responded to a viewer comment that compared his appearance to a TV character by sharing the commenter's personal information publicly — an act of doxxing. The commenter was disabled. The response was filmed and posted. Ryse terminated the sponsorship within days. The incident generated significant social media backlash and press coverage across fitness industry publications.

The Signal Intelligence lesson

The content score for this creator's feed would have shown nothing unusual. His workout content, product reviews and standard fitness posts were unremarkable. The incident occurred in a comment response — a behavioural signal, not a content signal. This is the category of Creator Risk that automated scoring consistently misses: how a creator behaves in community interactions, under pressure, in unscripted moments.

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Creator Risk in the fitness category increasingly originates in community engagement, not sponsored content. Monitoring a creator's comment behaviour — how they respond to criticism, negativity, and challenging audiences — is a separate data layer from content scoring. Both are required for a defensible vetting process.

RECOMMENDED ACTION

Ask your creators or agencies for a community engagement review, not just a content audit. Comment behaviour, responses to criticism, and conduct under pressure are observable signals — they belong in the assessment.

03 — WHAT THE ARPP NOW HEARS

France · ARPP AI enforcement expansion · H1 2025 confirmed

The most significant compliance development in the European Creator Risk Landscape this year is not a new law. It is a technology upgrade that has fundamentally changed enforcement risk for every brand activating creators in France.

What changed

France's ARPP (Autorité de Régulation Professionnelle de la Publicité) confirmed in its 2025 Annual Report that AI-powered monitoring is now active across Instagram, TikTok and YouTube. In H1 2025, the ARPP analysed over 194,000 pieces of content — a 222% increase on 2024 volumes. Critically, the AI system now incorporates speech-to-text analysis. Verbal mentions of brand partners in video content — previously undetectable without manual review — are now scanned as part of standard enforcement monitoring.

What this means for brands

Verbal disclosure now required

Saying a brand name in video without on-screen disclosure is now detectable as non-compliant. Audio-only mentions no longer avoid enforcement.

Undisclosed gifting in scope

Product gifting — including footwear, clothing, samples — triggers disclosure obligation under Loi n°2023-451 even where no fee was paid.

Brand liability is joint

Under French law, brands share legal liability with creators for disclosure failures. The brand's contract is not a shield — it is a liability document.

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Any brand with French creators on gifting or paid programmes should audit disclosure practices against ARPP standards now — not at renewal. The ARPP's AI does not issue warnings. It flags violations directly. The compliance window before enforcement has narrowed significantly.

RECOMMENDED ACTION

French brands should review influencer contracts to ensure audio disclosure requirements are explicit — verbal brand mentions in video content now require on-screen disclosure to comply with ARPP standards. Brief your creators on this now. The ARPP's system does not distinguish between brands that didn't know and brands that chose not to comply.

04 — REGULATORY SNAPSHOT

Key developments across European markets · March 2026

FRANCE	ARPP AI monitoring now includes speech-to-text. Verbal brand mentions without on-screen disclosure now detectable. Maximum fine €300,000. Brand liability joint and several with creator.

RECOMMENDED: Review influencer contracts to include audio disclosure clauses. Contact your Creator Portfolio to confirm compliance. Verify ARPP certification status for all active creators.

GERMANY	UWG §5a(4) enforcement active. Brands are liable for creator disclosure failures even without direct supervision. Competitor brands regularly bring private enforcement cases. Hashtag-cloud disclosure has been ruled insufficient by multiple German courts.

RECOMMENDED: Audit all disclosure label placements across your German Creator Portfolio. Ensure contracts contain UWG-compliant disclosure language.

ITALY	AGCOM Code of Conduct applies to all creators with 500k+ followers or 1M monthly views from July 2025. Maximum fine €600,000 — highest in Europe. Ferragni Law now governs all charitable marketing claims in influencer partnerships.

RECOMMENDED: Check whether any Italian creators exceed the 500k/1M threshold triggering AGCOM obligations. Review any charitable partnership claims against Ferragni Law requirements.

UK	Digital Markets, Competition and Consumers Act 2024 enforcement began April 2025. CMA powers significantly strengthened. ASA AI-based Active Ad Monitoring now scanning at scale. FCA finfluencer rules active.

RECOMMENDED: If your Creator Portfolio includes any finance or investment-adjacent creators, conduct an FCA compliance review. Review all UK creator contracts against updated CMA enforcement standards.

EU-WIDE	EU AI Act (2026) requires AI-generated influencer content to be labelled. DSA requires platforms to remove non-compliant content within 24 hours. European Commission's Digital Fairness Act expected Q3-Q4 2026 — expected to introduce EU-wide influencer marketing obligations if adopted in its current form.

RECOMMENDED: Audit your Creator Portfolio for AI-generated or heavily AI-edited content — EU AI Act labelling requirements are now in force. Monitor Digital Fairness Act progress closely.

05 — OPINION

The regulatory tide is turning — and it is moving faster than most brands realise

France moved first, and it moved hard. The Loi Influenceurs (2023), the ARPP's AI enforcement expansion, the 222% increase in content reviewed — these are not incremental updates. They represent a systematic decision by a major European market to treat influencer marketing as a regulated activity, not a creative free zone. The question is no longer whether other markets will follow. It is which one moves next, and how quickly.

Germany is the most likely candidate for the next significant escalation. UWG enforcement is already active and competitor-driven private cases are becoming routine. What Germany lacks — for now — is the AI-powered monitoring infrastructure that the ARPP has deployed. When that changes, and the signals suggest it will, the enforcement velocity will shift from reactive to proactive overnight.

In the UK, the picture is more complex. The ASA's AI-based Active Ad Monitoring system is now scanning at scale — 50,000+ posts reviewed in 2025 — and the ASA has confirmed it will apply targeted sanctions against repeat offenders, including publicly naming non-compliant creators and their brand partners. The Committee of Advertising Practice has been explicit: all parties in the advertising supply chain share responsibility. That language matters. It means a brand whose creator fails to disclose is not a bystander. It is a co-defendant.

The European Commission's Digital Fairness Act, expected in Q3-Q4 2026, will be the most significant development of the year. Its scope is broad: dark patterns, influencer marketing obligations, addictive design, AI content labelling — all under one legislative instrument covering all 27 member states. The consultation that closed in October 2025 received 3,341 responses. Around two-thirds of respondents supported new legislation. The Commission's impact assessment is due Q2 2026. This is not a distant horizon. It is the next twelve months.

Our view is this: the brands that treat compliance as a 2027 problem will be managing a 2026 crisis. The enforcement infrastructure is already in place across France, the UK, Italy and Germany. The AI systems are live. The fines are real. The conditions for similar incidents to emerge elsewhere now exist across every major market.

ASSESS PORTFOLIO-LEVEL EXPOSURE

The Signal is published monthly by Signal Intelligence. Each issue covers real Creator Risk incidents, regulatory developments, and the intelligence that brand-side teams need before they need it. The cases in this issue — the ABC / Disney incident, the community behaviour risk, the ARPP enforcement expansion — all point toward the same question: what would a systematic assessment of your full creator portfolio reveal? signalintelligence.consulting