BRSG Compliance Standard · v1.1 · effective 2026-06-25 · standards.billricestrategy.com

Affiliate & Sponsorship Disclosure Standard

Owner: Bill Rice (BRC LLC d/b/a Bill Rice Strategy Group) **Version:** v1.1 — 2026-06-25 **Scope:** All content published, edited, or distributed by BRC LLC d/b/a Bill Rice Strategy Group ("BRSG") on its owned and operated properties, and any content produced by BRSG contractors for publication on those properties. **Status:** Deployable. Counsel review recommended before next significant affiliate program expansion.

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1. Scope and Definitions

1.1 Why this standard exists

BRSG publishes informational and how-to content about mortgage lending, real estate investing, and personal finance across multiple owned properties. Many of those properties either carry affiliate links to third-party financial products and services or may in the future. The FTC's Endorsement Guides (16 CFR Part 255, substantially updated in August 2023) require that any material connection between a publisher and the products or services that publisher promotes be disclosed clearly and conspicuously to readers. Failure to disclose is a deceptive practice under FTC § 5 (15 U.S.C. § 45), exposed to civil investigative demands, injunctive relief, and civil penalties.

This standard implements that requirement across all BRSG content properties. It defines what counts as a material connection, when disclosure is required, what adequate disclosure looks like, and how it is operationalized at the content and property level.

1.2 Key definitions

BRSG-owned property. Any website, newsletter, social media account, podcast, or other content channel owned, operated, or published by BRC LLC d/b/a Bill Rice Strategy Group. The current roster of owned properties is maintained outside this standard — in the compliance program's owned-properties reference and the periodic property audit — and is not enumerated here, so the standard does not require revision each time the roster changes.

Affiliate link. A hyperlink containing a tracking parameter that routes through a third-party affiliate network or tracking system, resulting in a potential commission or other compensation to BRSG when a reader clicks the link or takes a subsequent action (purchase, sign-up, application, download). Affiliate links are the primary trigger for disclosure requirements under this standard.

Sponsored content. Any article, post, video, podcast episode, newsletter issue, or other content unit that is created, commissioned, or funded in whole or in part by a third party in exchange for favorable, featured, or sponsored placement of that party's product, service, or brand. Sponsorship is a separate trigger from affiliate links — a piece may require disclosure for both reasons simultaneously.

Compensated mention. Any reference to a specific third-party product, service, person, or company where BRSG or Bill Rice receives or has received direct or indirect compensation in exchange for that mention — including cash payment, free access, reciprocal promotional arrangements, co-marketing agreements, a lead-referral fee, or an equity stake in the mentioned company.

Material connection. Any relationship between BRSG (or its owner, Bill Rice) and a recommended or mentioned product/service/company that a reasonable reader would want to know about before deciding how much weight to give the recommendation. Under FTC guidance, material connections include: affiliate commissions, sponsorship fees, free products received for review, employment or consulting relationships, ownership stakes, and ongoing commercial relationships (e.g., a lead-buy agreement). The standard for "material" is whether the connection would affect how a reasonable reader weighs the content — if yes, disclose.

Disclosure. A clear and conspicuous statement, placed close to the relevant content, that informs the reader of the material connection between BRSG and the recommended product/service/company. Adequate disclosure is defined in Section 3.

Editorial content. Content where BRSG has not received any compensation related to the products, companies, or services discussed, and has no existing commercial relationship with them. Editorial content does not require an affiliate/sponsorship disclosure, though it may still require general accuracy and UDAP compliance.

1.3 Covered properties

This standard applies to every BRSG-owned property, regardless of type. For deployment, properties are grouped by type in Section 4 — content hubs; lead-generation and own-service properties; consulting and thought-leadership properties — because affiliate-risk profiles differ by type. The standard also applies to any newsletter distributed under a BRSG property brand, any social media content published from a BRSG-owned account, and any content distributed through third-party syndication that originated on a BRSG property.

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2. When Disclosure Is Required

2.1 Trigger conditions — any one is sufficient

A disclosure is **required** whenever any of the following is true:

1. **Affiliate link present.** The content includes a hyperlink that contains affiliate tracking parameters for any program (Amazon Associates, Shareasale, Impact, CJ Affiliate, a private affiliate arrangement, or equivalent). It does not matter whether the link is labeled "click here," embedded in a product name, or contained in a button — if it tracks through an affiliate system, disclosure is required.
2. **Compensation received for mention.** BRSG received any form of payment — cash, free product, free service access, free trial, media kit item, or reciprocal promotional consideration — in connection with the mention, review, or recommendation of a specific third-party product, service, or company.
3. **Sponsorship relationship.** A third party paid, gifted, or provided consideration to BRSG (or to Bill Rice personally) in exchange for content being created, published, or distributed.

4. **Ongoing commercial relationship.** BRSG has an active commercial agreement with the company being recommended or mentioned — such as a client relationship, a lead-referral partnership, a co-marketing agreement, or a vendor/reseller agreement — and the content promotes or favorably covers that company's products or services.
5. **Equity or financial interest.** Bill Rice or BRC LLC holds any equity stake, partnership interest, or profit-sharing arrangement in a company that is recommended, compared favorably, or featured in the content.

2.2 Situations that do NOT require affiliate/sponsorship disclosure

The following do not require an affiliate or sponsorship disclosure (though other disclosures may apply):

- Editorially independent reviews where BRSG received no compensation and has no commercial relationship with the reviewed company.
- General educational or how-to content that mentions product categories (e.g., "bank statement loans") without recommending specific vendors.
- Content citing publicly available data, academic research, government sources, or news reporting.
- Content that mentions BRSG's own services (consulting, strategy work) — no third-party affiliate relationship exists.

Note: even editorial content about financial products carries FTC § 5 / CFPB UDAP accuracy obligations. Claims must be substantiated. "No affiliate relationship" does not mean "no compliance obligation."

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3. What Adequate Disclosure Looks Like

3.1 The three requirements: clear, conspicuous, and proximate

The FTC requires disclosures to be **clear**, **conspicuous**, and **proximate** to the trigger. All three must be satisfied simultaneously. Satisfying two out of three is not adequate.

Clear. The disclosure must be understandable to an ordinary reader without specialized knowledge. Vague language like "this page may contain links" or "partnerships exist" does not meet the standard. The reader must be able to understand, from the disclosure language alone, that a financial relationship exists and what its nature is.

Conspicuous. The disclosure must stand out from surrounding content so the reader notices it. It cannot be buried in fine print, in a footer, in an "about" page link, in a privacy policy cross-reference, or in a sidebar the reader is likely to scroll past. A disclosure buried below the fold, after the affiliate links themselves, or in a color that blends into the background is inadequate.

Proximate. The disclosure must appear close in space and time to the affiliated recommendation. For written content, "close" means before or immediately adjacent to the first affiliate link on the page — not just at the very bottom of a 3,000-word article. For a comparison table, the disclosure must appear before the table.

3.2 Placement rules by content type

ARTICLE OR BLOG POST (STANDARD FORMAT)

- **Required location 1 — article-level disclosure block:** A disclosure statement appears at the top of the article body, above the first affiliate link and above the fold on most screens. It must be visible without scrolling on desktop and mobile.
- **Required location 2 — inline, proximate to each linked recommendation:** Where the article contains a specific product or service recommendation paired with an affiliate link, an inline disclosure (e.g., "**affiliate link**" or "**[ad]**" label adjacent to or immediately after the link) must appear.
- **Site-wide footer disclosure:** Acceptable as a supplementary layer only — it does not substitute for the article-level block or inline labels.

COMPARISON OR "BEST OF" LIST POSTS

- Disclosure block before the list or comparison table.
- Each affiliate-linked entry individually labeled.

PRODUCT REVIEWS

- Disclosure at the very top of the review, before any description of the product.
- If a free product or trial access was received for review purposes, the disclosure must state that specifically (e.g., "I received free access to this software in exchange for this review").

SPONSORED POSTS / ADVERTORIAL

- The post must be labeled with the word "Sponsored" or "Advertisement" or "Paid Partnership" prominently in the title or immediately below the headline. The word "Ad" alone is acceptable if styled to be conspicuous (not light gray on white).
- Sponsored labels must appear in the published HTML — not just in a metadata field, author byline, or hidden element.

NEWSLETTERS

- Disclosure statement in the newsletter introduction if the issue contains sponsored sections or affiliate links.
- Inline label ("**sponsor:**" or "**affiliate:**") adjacent to each sponsored or affiliate item.

SOCIAL MEDIA POSTS (IF PUBLISHED FROM BRSG-OWNED ACCOUNTS)

- "#ad" or "#sponsored" must appear in the post text itself, not in a comment, not buried at the end of a long hashtag string. On video platforms (YouTube, TikTok), the disclosure must appear in the video itself — not just in the description.

3.3 Required disclosure language

The following disclosure language meets the FTC standard. Use one of these blocks or any variant that preserves the specificity. Do not use vague language like "links on this page may be affiliate links."

Standard article-level block (use for any content with affiliate links):

> **Disclosure:** This article contains affiliate links. If you click an affiliate link and take an action (such as applying for a loan, signing up for a service, or making a purchase), BRSG may earn a commission at no additional cost to you. We only link to services we have researched. Affiliate relationships do not influence our editorial conclusions.

Sponsored content block (use for sponsored posts or sections):

> **Sponsored:** This content was created in partnership with [Company Name]. BRSG received compensation to produce this content. Our editorial standards apply; all claims are our own.

Free product/trial received for review:

> **Disclosure:** [Company Name] provided free access to [product] for review purposes. BRSG was not compensated for this review. Our assessment is independent.

Inline link label (adjacent to individual affiliate links):

> [affiliate link] — appears as a parenthetical or superscript immediately after the hyperlinked text.

Acceptable shorthand labels inline: "**[ad]**", "**[affiliate]**", "**[sponsor]**". These are acceptable inline labels only when the article-level block with full language appears above.

3.4 What does NOT constitute adequate disclosure

The following practices are specifically prohibited because they do not meet FTC standards:

- A generic footer that says "this site participates in affiliate programs" — adequate as a supplementary layer only; not a substitute for article-level or inline disclosure.
- A "disclosure policy" page linked from the footer with no on-page disclosure — the FTC has stated that a separate page linked from navigation does not cure the absence of a proximate disclosure.
- The word "partner" used as a euphemism without explaining that compensation is involved.
- Disclosure only in an author bio or "about this author" section.
- A tooltip or hover text — disclosure must be visible without user action beyond reading.
- A color that does not contrast sufficiently with the background (disclosure text should meet or approximate WCAG AA contrast for body copy).

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4. Deployment by Property Type

BRSG's owned properties fall into a few types, each with a different affiliate-risk profile. Apply the checklist for the type(s) that match a given property. The current roster of properties — and which type each one is — is maintained outside this standard (in the owned-properties reference and the periodic property audit). The standard does not name domains, so it does not require revision when the roster changes.

4.1 Content hubs (informational and how-to financial content)

Properties that publish educational, comparison, or how-to content about lending, real estate investing, crypto-backed lending, self-employed mortgages, or personal finance. Primary affiliate risk: outbound links to lenders, financial platforms, comparison/analysis tools, software, or service providers where BRSG earns referral fees — and "best of" / comparison posts and lender-directory pages.

Required implementations:

- [ ] Article-level disclosure block in the article template — renders above the first affiliate link, above the fold, on every post that carries affiliate links.
- [ ] Post-type metadata flag (e.g., `hasAffiliateLinks: boolean`) that triggers the disclosure block automatically.
- [ ] Inline `[affiliate]` label pattern available in the content editor and applied to each affiliate-linked recommendation.
- [ ] Lender directories and comparison / "best of" pages: a disclosure visible at the top of the directory or table (not only in the footer), plus per-entry flagging of which listings are paid.
- [ ] Site-wide footer secondary disclosure line, so users entering via any page see a disclosure (supplementary layer only — does not substitute for the proximate disclosure).
- [ ] A dedicated affiliate-disclosure page, linked in the footer.
- [ ] If a recommended company is also a paying client or referral partner of BRSG or an affiliated entity: disclose that commercial relationship explicitly, not just "affiliate."
- [ ] If a recommended vendor also pays Bill Rice consulting revenue: enhanced disclosure noting both the affiliate and the consulting relationship.
- [ ] For mortgage and settlement-service links specifically: confirm any compensation is per-click/per-lead advertising and not a referral fee contingent on a loan closing (RESPA § 8); state this where relevant.

4.2 Lead-generation and own-service properties

Properties whose primary calls-to-action are for BRSG's own offerings (lead data, lead-gen services, demos, verification). Affiliate risk is lower because the main CTAs are BRSG's own products, but it is not zero:

- [ ] If the property links out to third-party tools, data providers, or platforms via affiliate tracking: disclose per Section 3.
- [ ] If blog posts or resources on the property contain affiliate links: disclose per Section 3.
- [ ] Testimonials: disclose any material connection between BRSG and the person giving the testimonial (client relationship, discount, or other consideration) — do not present compensated or client testimonials as unsolicited third-party validation.
- [ ] Where the founder holds a named role with a recommended provider, disclose that relationship affirmatively (this is the exemplary pattern already in use on at least one BRSG property).

4.3 Consulting and thought-leadership properties

Properties that market BRSG's consulting and strategy work and publish thought leadership. Primary risk: recommended tools, books, courses, or software where BRSG earns affiliate fees (e.g., an Amazon affiliate book list or a "tools I use" page), and partner recommendations presented without disclosure.

- [ ] Any "tools I use," "resources," or recommended-reading page: disclosure at the top of the page.
- [ ] Individual posts containing affiliate links: article-level disclosure block.
- [ ] Named partner recommendations (e.g., a referral or co-marketing partner): if a material connection exists, disclose it proximate to the mention.
- [ ] Client testimonials: disclose the client relationship; do not present as unsolicited third-party validation.

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5. Contractor and Content Creator Obligations

5.1 Disclosure is the publisher's responsibility

BRSG is the publisher of record for all content on its owned properties. Regardless of whether content is written by Bill Rice, a freelance writer, a contractor, or produced with AI assistance, the disclosure obligation falls on BRSG as publisher. "The contractor didn't tell me" is not a defense under FTC § 5.

5.2 What contractors must do

Any person who writes, edits, or publishes content for a BRSG property must:

1. **Flag affiliate links.** When inserting any link that contains affiliate tracking parameters, flag it in the content management system (Sanity) using the `[affiliate]` inline label pattern and mark the post as having affiliate links in the metadata.
2. **Disclose received compensation.** If the contractor personally received any product, access, payment, or other consideration from a third party related to the content they are producing — even if BRSG did not — they must notify Bill Rice in writing (email is sufficient) before the content is published, so the disclosure language can be updated accordingly.
3. **Do not add affiliate links without approval.** Contractors may not insert new affiliate program links to BRSG content without prior authorization from Bill Rice. Unauthorized affiliate links expose BRSG to undisclosed material connections.

5.3 AI-generated content

AI tools are frequently used to assist in drafting content for BRSG properties. The use of AI does not change, reduce, or eliminate the disclosure obligation for affiliate links or sponsorships in that content. If the published content contains affiliate links, disclosure is required regardless of how the surrounding text was produced. See the forthcoming AI Content Disclosure Protocol for additional AI-specific obligations.

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6. Audit and Maintenance

6.1 New content pre-publish checklist

Before publishing any new content on a BRSG-owned property, confirm:

- [ ] Does this post contain any affiliate links? If yes → article-level disclosure block present and above the fold.
- [ ] Is this post sponsored or did BRSG receive any compensation to produce it? If yes → sponsored content disclosure block present in the headline area.
- [ ] Does this post contain specific product/service recommendations? If yes → are inline `[affiliate]` labels applied to each affiliated link?
- [ ] Does this post include testimonials? If yes → is the relationship between BRSG and the person giving the testimonial disclosed if material?

6.2 Annual retroactive audit

Once per year, Bill Rice (or a designated contractor) conducts a retroactive audit of the highest-traffic posts on each BRSG property. The audit checks:

- Affiliate links present but disclosure missing or inadequate → retrofit disclosure.
- Disclosure language is vague (e.g., "this page has affiliate links" without explaining what that means) → update to required language in Section 3.3.
- Footer secondary disclosure missing → add.
- Comparison pages or "best of" lists with affiliate links but no table-level disclosure → add.

6.3 New affiliate program onboarding

Before adding a new affiliate program to any BRSG property:

1. Record the program name, network, commission structure, and affected properties in the affiliate program registry (maintained separately in `~/Documents/brsg/_internal/compliance/affiliate-registry.md`).
2. Confirm that the disclosure block on the affected property's article template is live.
3. If the program involves a company with whom BRSG also has a commercial (non-affiliate) relationship, update disclosure language to reflect both relationships.

6.4 Document version history

VERSION	DATE	SUMMARY
v1.0	2026-06-25	Initial standard — all BRSG owned properties
v1.1	2026-06-25	Removed enumerated site roster from the standard (§1.2, §1.3); the property list now lives in the owned-properties reference and the property audit. Restructured §4 from per-named-domain to by-property-type (content hubs / lead-gen / consulting). Genericized the cross-business commercial-relationship line. Added RESPA § 8 note for mortgage/settlement links and the founder-role disclosure pattern.

When this standard is cited in a contract, vendor agreement, or counsel memo, cite it **by version** (e.g., "Affiliate & Sponsorship Disclosure Standard v1.1") so the reference is pinned to a fixed text. The version and date in the header above are authoritative.

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7. Legal Basis and Regulatory References

This standard is grounded in the following regulatory sources:

FTC Endorsement Guides, 16 CFR Part 255 (updated August 2023). The controlling rule for affiliate and endorsement disclosures in the United States. The 2023 update extended and clarified the definition of "material connection," added social media-specific requirements, and made explicit that disclosure obligations apply regardless of medium (web, video, audio, social).

FTC § 5, 15 U.S.C. § 45. The general prohibition on unfair or deceptive acts or practices in commerce. Undisclosed affiliate relationships have been the subject of multiple FTC enforcement actions and civil investigative demands under § 5.

FTC Business Guidance: Disclosures 101 for Social Media Influencers (2019, reaffirmed 2023). While aimed at individual influencers, the guidance's plain-language articulation of "clear and conspicuous" applies equally to content publishers. The "hard to miss" standard — not buried in a string of hashtags, not in a hover tooltip — defines the floor.

FTC Staff Report: Endorsements, Influencers, and Reviews (2023). Confirms that AI-generated reviews and AI-assisted content do not create an exemption from disclosure requirements; the publisher's obligation survives.

California Business and Professions Code § 17500 et seq. (False Advertising Law). California's analogue to FTC § 5. Applies to BRSG content accessible to California residents. Same disclosure standard effectively applies.

CFPB UDAAP (12 U.S.C. § 5531). For content on BRSG properties that discusses consumer financial products (mortgage loans, HELOC, personal loans), the CFPB's prohibition on unfair, deceptive, or abusive acts or practices in connection with consumer financial products applies. Undisclosed affiliate fees on financial product recommendations can constitute a deceptive act under UDAAP.

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8. Quick Reference — Disclosure Decision Tree

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Does this content appear on a BRSG-owned property?
│
└── Does it contain a link with affiliate tracking parameters?
    │   YES → Disclosure required (article-level block + inline labels)
    └── Was BRSG paid, gifted product, or given consideration to produce it?
        │   YES → Sponsored content disclosure required
        └── Does it recommend a specific product/service/company?
            │   YES → Does BRSG have a commercial relationship with that company?
            │         YES → Compensated mention disclosure required
            │         NO  → Editorial (no affiliate disclosure required; accuracy obligatio
            └── No specific recommendation → No affiliate disclosure required
```