AI Content Disclosure Protocol

Owner: Bill Rice (BRC LLC d/b/a Bill Rice Strategy Group) **Version:** v1.0 — 2026-06-25 **Scope:** All content published on BRSG-owned properties that is generated or materially assisted by AI tools, and any AI-driven feature (chat, recommendation, synthesis) BRSG operates on those properties. Defines when and how AI involvement is disclosed, and the accuracy obligations that AI assistance does not relieve. **Status:** Deployable. Counsel review recommended before launching any consumer-facing AI feature (chatbot, automated recommendation engine).

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1. Why this standard exists

BRSG uses AI tools to assist in drafting and producing content across its properties, and may operate AI-driven features (e.g., a content-synthesis pipeline or a recommendation widget). Two regulatory currents bear on this:

1. **Transparency.** The FTC has made clear that AI-generated or AI-assisted content is not exempt from any existing obligation — endorsements, substantiation, and deception rules all apply regardless of how the text was produced. Separately, state AI-transparency laws (notably California's AI Transparency Act, SB 942) are moving toward requiring that AI-generated content be identifiable, particularly where consumers could be misled about whether they are dealing with a human or a machine.
2. **Accuracy.** AI systems fabricate facts, citations, statistics, and technical details. For a publisher of financial content, an unreviewed AI claim about a loan program, a rate, or a regulation is a direct UDAP/UDAAP exposure.

This protocol sets a posture that is honest about AI use without over-labeling routine assistance, and that puts a hard accuracy gate in front of anything AI produces.

2. Definitions

AI-assisted content. Content where AI tools helped draft, outline, edit, or research, but a human selected the topic, directed the work, and reviewed and approved the result before publication. This is the normal BRSG production mode.

AI-generated content. Content published substantially as produced by an AI system with little or no human authorship — e.g., bulk-generated pages, automated summaries published without substantive human editing.

AI feature. A consumer-facing system that produces output on demand — a chatbot, a "ask our AI" tool, an automated recommendation or scoring widget.

Synthetic media. AI-generated or AI-altered images, audio, or video.

3. Disclosure rules

3.1 AI-assisted content (routine production)

No per-article AI label is required where a human directed the work and reviewed it before publishing, and the AI's role was drafting/editing assistance. Over-labeling routine assistance is not the goal and dilutes meaningful disclosure. **However**, the accuracy gate in Section 4 applies in full, and a general statement of AI use in the site's editorial/about section is encouraged.

3.2 AI-generated content (minimal human authorship)

Content published substantially as the AI produced it must be **identifiable as AI-generated**, via a visible label on or near the content (e.g., "This article was generated with AI assistance and reviewed for accuracy"). BRSG's default is to avoid publishing in this mode for financial content; if it is used, the label is mandatory and the accuracy review in Section 4 is non-negotiable.

3.3 Consumer-facing AI features

Any chatbot, "ask our AI," or automated-recommendation feature must disclose, at the point of interaction, that the user is interacting with an automated system — not a human and not personalized financial advice. The disclosure must be visible before or at the first interaction, not buried in terms.

3.4 Synthetic media

AI-generated images, audio, or video that a reasonable person could mistake for a real photograph, a real person, or a real event must be labeled as AI-generated. Purely decorative or obviously stylized AI illustration does not require labeling. AI-generated likenesses, testimonials, or "customer" personas are prohibited (see § 5).

4. Accuracy gate (applies to ALL AI involvement)

AI assistance never reduces the publisher's accuracy obligation. Before any AI-touched content is published:

1. **A human verifies every factual claim** — rates, program terms, statutory references, statistics, citations — against a real source. AI-produced specifics (a regulation's section number, an API field, a lender's terms) are treated as "points at a claim to check," never as the source of truth.
2. **No fabricated data, citations, or sources.** If a statistic or citation cannot be traced to a real, verifiable source, it is removed. This mirrors the program-wide no-fabricated-data rule.
3. **Financial claims are substantiated.** Content discussing consumer financial products must meet the same substantiation bar as human-authored content under FTC § 5 and CFPB UDAAP.
4. **No fabricated experiences or personas.** AI must not be used to manufacture first-person experiences, reviews, or testimonials presented as real (see § 5).

5. Prohibited uses

- **Fake reviews or testimonials.** AI-generated reviews, endorsements, or "customer" voices presented as genuine are prohibited and are an FTC enforcement priority.
- **Fabricated personas.** No AI-manufactured author identities or first-person experiences presented as a real person.

- **Fabricated credentials or data.** No AI-invented statistics, citations, certifications, or compliance logos.
- **Undisclosed AI in a context implying human expertise.** An AI feature that gives the impression of personalized professional advice without disclosing it is automated.

6. Interaction with the Affiliate Standard

If AI-assisted or AI-generated content contains affiliate links, the full Affiliate & Sponsorship Disclosure Standard applies. The use of AI neither creates nor excuses an affiliate-disclosure obligation — that obligation is determined solely by the presence of affiliate links or material connections, regardless of how the surrounding text was produced.

7. Legal basis

- **FTC § 5, 15 U.S.C. § 45**, and FTC AI guidance — AI-produced content carries the same deception and substantiation obligations as any other content; AI-generated endorsements/reviews are an enforcement focus.
- **California AI Transparency Act (SB 942)** and the broader trend toward state AI-disclosure requirements — the direction of travel is that AI-generated content and AI systems be identifiable to consumers.
- **CFPB UDAAP, 12 U.S.C. § 5531** — financial-product content obligations apply to AI-assisted content.

Version History

VERSION	DATE	CHANGE
v1.0	2026-06-25	Initial protocol. Distinguishes AI-assisted (no label, full accuracy gate) from AI-generated and AI features (labeled); hard accuracy gate; prohibited uses.

When this protocol is cited in a contract or counsel memo, cite it **by version** (e.g., "AI Content Disclosure Protocol v1.0"). The version and date in the header above are authoritative.