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Federal Election Commission
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Submitted via email and U.S.P.S.

Petition for Rulemaking to Require Disclaimers on Paid Political Communications Created or Promoted by Influencers

Dear Ms. Stevenson,

Voters have a right to know who paid for the political ads they see, yet this basic principle of electoral transparency may soon be undermined by a wave of influencer political ads that misleadingly provide no information about who paid for them. To prevent this, Campaign Legal Center (“CLC”) petitions the Federal Election Commission (“FEC” or “Commission”) to implement a rule¹ requiring political communications created or promoted for a fee by “influencers”—individuals that share media content, often for compensation, with a significant number of subscribers or followers on social media platforms—to feature a disclaimer identifying who paid for the creation or promotion of the communication, pursuant to the disclaimer provisions of the Federal Election Campaign Act (“FECA”).²

Contrary to FECA’s statutory disclaimer requirements, the Commission recently indicated that candidates, political parties, and even outside spending groups financed by major corporations and the ultrawealthy can pay influencers to create or promote political communications *without a disclaimer* indicating that the communications are, in fact, paid political ads. Without

¹ See 11 C.F.R. § 200.1 *et seq.*

² See 52 U.S.C. § 30120.

such a disclaimer, the people viewing this content have no way of knowing that they are viewing a paid political message and are thus likely to misperceive the message as something that the influencer shared organically and voluntarily. This influencer loophole in the Commission’s disclosure rules threatens to undermine crucial electoral transparency by creating an easy mechanism to mislead voters about political messages they are seeing and potentially relying on to make electoral decisions.

During the 2022 election, for example, the former reality television star Nicole “Snooki” Polizzi posted a video on Cameo, a site that allows users to buy personalized video messages from participating celebrities, which poked fun at Dr. Mehmet Oz, then a candidate for the U.S. Senate in Pennsylvania. The video, which jabbed at Oz for purportedly moving from New Jersey (Polizzi’s home state) to Pennsylvania to run for office, touched off a political critique that accused Oz of being a carpetbagger candidate; it was soon uploaded to the official X/Twitter page of Oz’s opponent, John Fetterman, and went viral, becoming one of the most discussed communications of the 2022 election.³

Taken at face value, Polizzi’s video could easily have been read as an off-the-cuff joke with no ulterior motives—and certainly no money changing hands—behind it. But in reality, the video was a campaign-funded communication aimed at advancing Fetterman’s candidacy: Fetterman’s campaign had paid Polizzi to make it, a fact that was not disclosed in the video.⁴ The “Snooki” video was an early instance of what has rapidly become common political practice: hiring influencers to finance electoral communications, often without disclosing that the influencer’s content is being paid for by a political group.⁵

Influencers’ Paid Political Content Needs to Feature Disclaimers

It is axiomatic that voters have a right to know who is spending money to influence their vote; transparency is one of the bedrock principles of our democracy. FECA’s disclosure framework—including both the mandatory

³ X, @JohnFetterman, (Jul. 14, 2022), <https://x.com/JohnFetterman/status/1547683652791717891?s=20&t=kylmASxYE1TO8oIcMzRGYg>.

⁴ See Chris Cioffi, *To Cameo or Not to Cameo? That’s the Question for Political Campaigns*, Roll Call (Aug. 3, 2022), <https://rollcall.com/2022/08/03/to-cameo-or-not-question-for-political-campaigns/>.

⁵ See Stephanie Lai, *Campaigns Pay Influencers to Carry Their Messages, Skirting Political Ad Rules*, N.Y. Times (Nov. 2, 2022), <https://www.nytimes.com/2022/11/02/us/elections/influencers-political-ads-tiktok-instagram.html> (“[S]ocial media influencers and microinfluencers — noncelebrity users who have attracted a moderately large following — are paid hundreds and sometimes thousands of dollars per post to circulate political messages, and they are part of a growing group of people who are being paid by campaign operatives to create content aimed at influencing the [2022] midterm elections.”).

periodic public reporting of funds raised and spent by political candidates and committees, as well as on-ad disclaimers identifying who paid for a specific political communication—is designed to protect that right. Yet gaps in the Commission’s disclaimer rules effectively invite the use of influencers to conceal this information. Voters are thus easily misled to believe that influencer content about a political candidate, party, or issue is the unpaid speech of someone they admire (or at least find interesting enough to “follow” on social media), rather than a paid communication akin to a political ad, in which the influencer is a hired mouthpiece for a political message.

This problem is neither hypothetical nor small in scale: Influencer marketing has become a well-established, sophisticated, and highly lucrative industry. An October 2024 report estimated that the influencer economy is worth approximately \$250 billion and poised to double in value by 2027.⁶ Influencer marketing is particularly suited to reaching younger people: a 2022 Pew Research poll found that “[f]ollowing influencers is correlated with age[, as] 72% of 18- to 29-year-old social media users say they follow influencers or content creators.”⁷ A cursory review of Forbes’s annual “Top Creators” list indicates that the most successful influencers—those most sought after due to their ability to provide access to a large audience—routinely reach hundreds of millions of followers, across a wide variety of digital platforms, while collectively earning billions of dollars.⁸

Moreover, the broader informational ecosystem—how people access the information that informs their electoral choices—has changed dramatically to incorporate influencers: A November 2024 Pew Research study found that roughly “one-in-five Americans—including a much higher share of adults under 30 (37%)—say they regularly get news from influencers on social media.”⁹ These influencers, moreover, are using their platforms to make money: the same study found that “a majority of news influencers (59%) monetize their online presence in some way, whether through subscriptions,

⁶ Danielle Chemtob, *Forbes Daily: The \$250 Billion Influencer Economy Is Booming*, Forbes (Oct. 28, 2024), <https://www.forbes.com/sites/daniellechemtob/2024/10/28/forbes-daily-the-250-billion-influencer-economy-is-booming/>.

⁷ Michelle Faverio and Monica Anderson, *For Shopping, Phones are Common and Influencers Have Become a Factor – Especially for Young Adults*, Pew Research Ctr. (Nov. 21, 2022), <https://www.pewresearch.org/short-reads/2022/11/21/for-shopping-phones-are-common-and-influencers-have-become-a-factor-especially-for-young-adults/>.

⁸ See, e.g., Top Creators 2024, Forbes (Mar. 4, 2025), <https://www.forbes.com/sites/stevenbertoni/2024/10/28/top-creators-2024-the-influencers-turning-buzz-into-billions/>.

⁹ Galen Stocking, *et al.*, *America’s News Influencers*, Pew Research Ctr. (Nov. 2024), https://www.pewresearch.org/wp-content/uploads/sites/20/2024/11/PJ_2024.11.18_news-influencers_report.pdf.

donations or merchandise sales.”¹⁰ Candidates, political parties, and outside spending groups have taken note and are increasingly turning to—and paying— influencers to spread their electoral messages.¹¹

Nearly twenty years after the Commission first addressed the internet’s role in elections,¹² political groups are now regularly spending major amounts of money to mobilize online influencers to back their candidates and causes. During the 2024 election, groups supporting both Kamala Harris and Donald Trump hired influencers, and both parties’ conventions hosted influencers.¹³ A super PAC supporting Harris’s candidacy, Priorities USA, reportedly spent \$1 million on influencer marketing,¹⁴ and acknowledged during the election that it “expect[ed] to pay between \$5,000 and \$15,000 for a single post.”¹⁵ Harris’s presidential campaign reported spending more than \$2.5 million to hire “three digital agencies that work with online influencers.”¹⁶ Nor has this trend altered course after the 2024 election: In June 2025, a dark money group reportedly contacted “dozens of Democratic political influencers” and offered

¹⁰ *Id.*

¹¹ See Cat Zakrzewski, *The New Dark Money: How Influencers Get Paid Big Bucks to Court Your Vote*, Wash. Post (Oct. 26, 2024), <https://www.washingtonpost.com/technology/2024/10/26/social-media-influencers-election-money-campaigns/> (“Online influencers who usually traffic in makeup, crocheting or parenting are earning thousands of dollars for a single TikTok or Instagram post on behalf of groups backing Vice President Kamala Harris or former president Donald Trump.”).

¹² See Internet Communications, 71 Fed. Reg. 18,589, 18,591 (Apr. 12, 2006), <https://www.federalregister.gov/d/06-3190/p-31> (“The 2004 election cycle also marked a dramatic shift in the scope and manner in which Americans used websites, blogs, listservs, and other Internet communications to obtain information on a wide range of campaign issues and candidates. The number of Americans using the Internet as a source of campaign news more than doubled between 2000 and 2004, from 30 million to 63 million. An estimated 11 million people relied on politically oriented blogs as a primary source of information during the 2004 presidential campaign, and 18 percent of all Americans cited the Internet as their leading source of news about the 2004 presidential election.”).

¹³ Taylor Lorenz, *Democratic Convention Will Host Hundreds of Online Influencers*, Wash. Post (Aug. 2, 2024), <https://www.washingtonpost.com/technology/2024/08/01/dnc-convention-chicago-creators/> (“More than 200 creators with large followings on TikTok, YouTube and other platforms have already been issued credentials to attend [the Democratic National Convention].”); Dylan Wells, *Republican Convention to Host Influencers in Pitch to Younger Voters*, Wash. Post (Jul. 13, 2024), <https://www.washingtonpost.com/politics/2024/07/13/rnc-tiktok-influencers-trump-delegates/> (“The Republican National Convention plans to host more than 70 influencers as part of a content creator program[.] . . . The content creators will have full convention credentials and will be given access to Trump campaign officials, delegates and other Republicans attending the event.”).

¹⁴ Makena Kelly, *This Was the Year of the Influencer Political Takeover*, Wired (Dec. 27, 2024), <https://www.wired.com/story/this-was-the-year-of-the-influencer-political-takeover/>.

¹⁵ Zakrzewski, Wash. Post, *supra* note 11.

¹⁶ Shane Goldmacher, *How Kamala Harris Burned Through \$1.5 Billion in 15 Weeks*, N.Y. Times (Nov. 17, 2024), <https://www.nytimes.com/2024/11/17/us/politics/harris-campaign-finances.html>.

them “\$8,000 per month to take part in a secretive program aimed at bolstering Democratic messaging on the internet,” while “mandat[ing] extensive secrecy about disclosing their payments.”¹⁷

The absence of a federal rule explicitly requiring disclaimers on paid influencer political content means that this growing category of political ad spending remains largely opaque, with influencers—or their funders—deciding the extent to which voters are informed or misled about influencer-disseminated political content. For instance, one influencer “who estimates 10 to 20 percent of his revenue comes from political posts” acknowledged that “he sometimes discloses when he is being paid by a political group, but not always.”¹⁸ Priorities USA, the pro-Harris super PAC, noted that it planned to “let the creator decide what they want to share’ regarding payment.”¹⁹ Of course, this kind of selective approach to disclosure is woefully inadequate, depriving voters of their right to know who is spending money to influence their vote, and undermining their ability to make informed electoral choices.

Absent corrective action, political groups will continue to exploit this loophole, which means that voters will continue to be denied crucial information—and be affirmatively misled—about influencer-disseminated political messages designed to sway their vote.²⁰

The Commission’s Recent Updates to its Disclaimer Regulations Left a Glaring Loophole for Influencers’ Political Ads

After failing to act for over a decade, in January 2024 the Commission finally finished revising its regulations to require disclaimers on political ads disseminated on digital devices, internet-powered apps, and social media platforms.²¹ The Commission revised its definition of “public communication”

¹⁷ See Taylor Lorenz, *A Dark Money Group Is Secretly Funding High-Profile Democratic Influencers*, Wired (Aug. 27, 2025), <https://www.wired.com/story/dark-money-group-secret-funding-democrat-influencers/> (describing a plan by a liberal nonprofit group named Chorus to recruit and pay Democratic influencers under contractual terms that reportedly stipulate that participating “influencers are not allowed to disclose their relationship with Chorus or [liberal dark money network] The Sixteen Thirty Fund—or functionally, that they’re being paid at all”).

¹⁸ Zakrzewski, Wash. Post, *supra* note 11 (“Michael Mezzatesta, a 33-year-old influencer who posts frequently about the climate to his 181,000 Instagram followers — including in favor of Harris’s policies — said he sometimes discloses when he is being paid by a political group, but not always. “To me, it depends on: How much is this something I would just be doing myself without any incentive?” said the Los Angeles-based creator, who . . . estimates 10 to 20 percent of his revenue comes from political posts.”).

¹⁹ *Id.*

²⁰ See Lorenz, Wired, *supra* note 17.

²¹ See Internet Communication Disclaimers and Definition of “Public Communication,” 87 Fed. Reg. 77,467, 77,471 (Dec. 19, 2022) (“The Commission is further revising the

to include all “communications placed *or promoted* for a fee on another person’s website, *digital device, application, or advertising platform.*”²² The Commission also adopted a new regulatory term, “internet public communication,” similarly defined as “any public communication over the internet that is placed or promoted for a fee on another person’s website, digital device, application, or advertising platform.”²³

Despite referencing “promoted” communications in these definitions, however, the Commission opted to carve out rather than cover political communications created or promoted for a fee by influencers. In an explanatory statement accompanying the final revised rule, the Commission expressly clarified that the terms “public communication” and “internet public communication” “do not apply to [situations] where an individual is paid to create or share political content,” including instances where “a political committee posts a video soliciting contributions on a social media site for free and then pays an individual to post the video on that individual’s social media page to share with the individual’s followers,” or where a “political committee pays an individual to create and post a communication online for the individual’s audience.”²⁴ By excluding these situations from the revised disclaimer rule’s reach, the Commission created a glaring loophole for an important and rapidly growing category of digital political advertising.

This loophole makes it far too easy to avoid providing disclaimers on political ads, cultivating problematic incentives to not only to leave voters in the dark but, in some cases, to affirmatively mislead them as to who is truly behind the political messages they are seeing. As CLC pointed out in a comment submitted while the Commission was deciding between competing versions of a revised digital disclaimer rule, “without a disclaimer that the influencer is being paid to promote this content, viewers might reasonably be left with the misleading and false impression that the influencer is organically supporting the committee’s message, instead of being hired to advertise on the committee’s behalf.”²⁵ Two commissioners also voiced these concerns, noting that the agency had “missed a golden opportunity to address the ever-increasing

definition of “public communication” to clarify that it covers general public political advertising on various types of internet media that may not be captured by the existing definition (*i.e.*, communications on digital devices, applications, or advertising platforms). This is to ensure that the same disclaimer requirements apply to general public political advertising across the internet ecosystem.”).

²² 11 C.F.R. § 100.26 (emphases added).

²³ 11 C.F.R. § 110.11(c)(5)(i).

²⁴ Technological Modernization, 89 Fed. Reg. 196, 210 (Jan. 2, 2024).

²⁵ CLC Comment in REG 2013-01 (Technological Modernization) at 2 (Jan. 9, 2023).

phenomenon of social media influencers who are paid to create or share political content.”²⁶

The Commission’s Twenty-year-old Rationale for Exempting Individuals Paid by Candidates, Parties, and PACs from the Disclaimer Rules is Outdated

In 2006, when the Commission first implemented rules to tackle how disclaimer requirements would apply to internet communications, it declined to require online “bloggers”—then perceived as the dominant category of individuals that would be affected by an internet disclaimer rule—to provide disclaimers when they were being paid to produce content by a candidate, political party, or PAC. The Commission’s rationale appears to have been that such disclaimers were unnecessary, since any payments to bloggers would be disclosed to the public on an FEC disclosure report filed by the political group making the payments, and that requiring unsophisticated bloggers to provide disclaimers on their political communications “would not be fair.”²⁷

Neither aspect of this rationale withstands scrutiny today. For starters, disclosing influencer payments on a committee’s FEC disclosure report is simply not a viable substitute for an on-ad disclaimer. Campaigns, parties, and PACs that hire online influencers typically pay media agencies that offer influencer marketing services, which means the influencer being paid would not be identified in the disclosure report—and may not be publicly identified as an employee or contractor of the influencer marketing agency.²⁸ That means

²⁶ Statement of Commissioners Ellen L. Weintraub and Shana M. Broussard Regarding the Commission’s Adoption of Final Rules in REG 2013-01 (Technological Modernization) at 1–2 (Dec. 14, 2023) (“Without disclaimers, the public may be unaware they are consuming paid political communications. No one is seeking to impede influencers from communicating with their fans or to prevent political actors from capitalizing on those channels. But the public is entitled to know when those influencers are being paid to spread a political message.”).

²⁷ Internet Communications, 71 Fed. Reg. at 18,602 (“The Commission invited comments on whether it should . . . require bloggers to disclose payments from a candidate, a political party, or a political committee . . . All but one of the comments received on this subject supported the Commission’s proposed approach that would not require bloggers to disclose payments received from candidates. Typical of the reaction was this comment: ‘The ethics of taking money to express opinions without disclosing those payments can certainly be questioned. But for purposes of the election laws, * * * no disclaimer should be required. Payments by campaigns are disclosed by campaigns. To require more of bloggers when others who receive payments from campaigns are not subject to similar disclosure requirements would not be fair.’ The Commission agrees [and] . . . is not changing the disclaimer rule to require bloggers to disclose payments from a candidate, a political party committee, or other political committee.”).

²⁸ Zakrzewski, Wash. Post, *supra* note 11 (“It is hard to track exactly how much campaigns and super PACs are spending on creators because they often distribute funds to large agencies that work with the creators, or they funnel payment through subcontracts that are

even with such disclosure, voters would still have no idea which influencers actually received the committee's payments, since only the name of the influencer's media firm—not the influencer's own name—would likely appear in the committee's disclosure report. Under the current rules, even the most intrepid and motivated person could not “follow the money” to figure out who paid for a particular influencer's political content.

For example, during the 2024 election, the Biden/Harris campaign disclosed spending nearly \$4 million for “digital consulting,” paid to “Village Marketing Agency,” a firm that offers influencer marketing services and proudly touts its work for the Biden/Harris campaign.²⁹ The Village Marketing Agency, however, does not appear to list the influencers that it works with—either in general, or specifically on the Biden/Harris campaign—thus making it impossible for someone to link the Biden/Harris campaign's payments to any specific influencer political content. In other words, without disclaimers, there is no practical way to know if a particular piece of influencer content was paid for by the Biden/Harris campaign.

Moreover, even if an influencer's name *was* disclosed in a committee's FEC reports, someone viewing that influencer's content online would then have to check the FEC's website, *after* the relevant reporting deadline had passed, to figure out that they had seen a paid influencer ad, rather than the influencer's own organic content. Most ordinary Americans will not undertake such steps to obtain the basic transparency regarding paid political ads to which they are constitutionally entitled. Nor should they have to. For the same reason that the law requires on-ad disclaimers for paid political ads shown on TV, in print, or on websites—*i.e.*, such disclaimers are the most effective way to ensure that viewers know they are seeing a paid ad, and know who paid for it—influencers must be required to provide an on-ad disclaimer for the political content they are paid to create or promote.

Additionally, it is perfectly “fair” to require influencers to abide by basic disclaimer rules governing paid political ads. As noted above, many influencers earn thousands or even millions of dollars as participants in a structured and

not visible in federal election filings.”); Lai, N.Y. Times, *supra* note 5 (“According to F.E.C. data, campaigns and political action committees have spent more than \$300 million dollars during [the 2022] election cycle on digital and social media advertising and consulting. It is impossible to discern how much of that has gone directly to influencers because PACs and campaigns typically pay firms that then contract work to influencers.”).

²⁹ See, e.g., Harris for President, Sept. 2024 Monthly Report (Sep. 20, 2024), <https://docquery.fec.gov/cgi-bin/fecimg/?202409209684050898>; see also Republican Nat'l Comm. Amend. 30-Day Post-Election Report at 1697 (Mar. 31, 2025), <https://docquery.fec.gov/cgi-bin/fecimg/?202504019755003992> (disclosing \$350,000 disbursement for “Media Buy” to “Creator Grid Inc,” a firm that “connects Republican candidates with the internet's most powerful conservative influencers”).

established marketing industry. These are, by and large, not small-time players, and to the extent the Commission remains concerned with “fairness” to smaller-scale bloggers and influencers, that concern could be addressed with a more targeted solution such as a monetary threshold for requiring disclaimers. But many influencers, particularly those sought out by political groups for their ability to reach large numbers of voters, are sophisticated entrepreneurs backed by lawyers and consultants that can help them navigate the disclaimer regulations necessary to protect voters.³⁰ Indeed, because influencers are already required, under Federal Trade Commission (FTC) rules,³¹ to disclose when they have a financial relationship with a brand they are being paid to promote, they are likely familiar with the general concept.³² Influencers that earn money from their work on elections can and must abide by the rules that exist to protect voters’ right to transparency.

Paid Influencer Communications Are “Public Communications”

Revising the disclaimer standard to include influencers’ paid political content could be accomplished simply by explicitly including such content in the Commission’s definition of “public communication.” Specifically, the Commission should clarify that the term “general public political advertising” includes all “communications over the internet” that are “created or promoted for a fee,” without limiting that category to communications where payment “is made to a website, digital device, application, or advertising platform.”³³ That would ensure the inclusion of payments made to others, like influencers, to create or promote communications over the internet.

These proposed regulatory revisions are consistent with FECA’s statutory disclaimer requirement. FECA requires that when any “political committee makes a disbursement for the purpose of financing any communication” including, *inter alia*, “any other type of general public political advertising,”

³⁰ See, e.g., *DLA Piper Unpacks Influencer Marketing Rules with Updated and Expanded Global Guide* (Sep. 18, 2025), <https://www.dlapiper.com/en/news/2025/09/dla-piper-unpacks-influencer-marketing-rules-with-updated-and-expanded-global-guide> (offering legal guidance to “navigate disclosure and labelling requirements for influencer-generated content”).

³¹ See *Disclosures 101 for Social Media Influencers*, Fed. Trade Comm’n <https://www.ftc.gov/business-guidance/resources/disclosures-101-social-media-influencers> (last viewed Oct. 23, 2025).

³² See Weintraub and Broussard, *supra* note 26 (“Influencers are now familiar with disclaimer regulations because they are obliged to disclose paid endorsements under other regulatory frameworks. And as noted above, payments to influencers have become big business. Concerns about unduly burdening unsophisticated social media influencers with disclaimer requirements are no longer relevant in light of these changes to the factual and legal landscape.”).

³³ 11 C.F.R. § 100.26.

that communication must “clearly state” who paid for the communication.³⁴ FECA likewise requires providing a disclaimer when “any person makes a disbursement for the purpose of financing communications” containing express advocacy, soliciting contributions, or for “any other type of general public political advertising.”³⁵ As such, whenever a political committee or any person pays for “general public political advertising,” FECA requires that those ads feature a disclaimer indicating who paid for them.

While “general public political advertising” is not defined in either FECA or Commission regulations, defining it to explicitly include influencers would be consistent with the Commission’s longstanding interpretation of the term. In its 2006 Explanation & Justification, the Commission noted that the term generally applies when the person making the communication pays “for access to an established audience using a forum controlled by another person, rather than using a forum that he or she controls to establish his or her own audience.”³⁶ This description essentially matches the “service” that an influencer offers: the political group hiring the influencer is paying “for access” to the influencer’s “established audience” (the users of the social media platform who subscribe or follow the influencer) on “a forum controlled by another person” — *i.e.*, the social media platform(s) where the influencer has established their audience.

This regulatory reform would not be the first of its kind: In June 2024, the Texas Ethics Commission voted unanimously, 7-0, “to require social media figures to disclose when they are paid for political advertisement.”³⁷ That reform was prompted by news reports revealing that a company run by allies of Texas Attorney General Ken Paxton, who was then facing impeachment, surreptitiously recruited and paid social media influencers “to parrot claims that [Paxton] is the victim of a political witch hunt,” and to promote “a series of videos alleging that the Texas Legislature is secretly controlled by Democrats intent on destroying Paxton and other conservatives.”³⁸

There is ample evidence that influencers have begun playing a major role in the political ad market and are poised to continue doing so. Without disclaimers, voters will too often be left with no idea they are seeing political

³⁴ 52 U.S.C. § 30120(a).

³⁵ *Id.*

³⁶ Internet Communications, 71 Fed. Reg. at 18,594–18,595.

³⁷ Robert Downen, *Texas Ethics Commission Will Require Influencers to Disclose When They’re Paid for Advertisement*, Texas Tribune (Jun. 18, 2024), <https://www.texastribune.org/2024/06/18/texas-ethics-commission-influencers-political-ads/>.

³⁸ Robert Downen, *Gen Z Influencers, Quietly Recruited By a Company With Deep GOP Ties, Rally to Impeached Ken Paxton’s Aid*, Texas Tribune (Aug. 14, 2023), <https://www.texastribune.org/2023/08/14/influenceable-texas-politics-ken-paxton/>.

ads created or promoted by influencers for a fee. The influencer loophole in the Commission's disclaimer rules thus threatens to fundamentally undermine the electoral transparency to which voters are entitled.

We respectfully petition the Commission to proactively close this loophole by requiring disclaimers on paid political content created or promoted by influencers.

Sincerely,

/s/ Saurav Ghosh

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