

Cheri Roeder
Cookie Lee Jewelry Independent Consultant

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To Whom It May Concern:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Unit Manager with Cookie Lee Fine Fashion Jewelry. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Cookie Lee Jewelry products.

One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new consultants. The Cookie Lee Fine Fashion Jewelry sales kit only costs between \$325 and \$640. People buy TVs, cars, and other items that cost much more than that and they do not have to wait seven-days. This waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary, because Cookie Lee Fine Fashion Jewelry already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Cookie Lee Fine Fashion Jewelry and will then have to send in many reports to Cookie Lee headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Cookie Lee Fine Fashion Jewelry is found guilty. Otherwise, Cookie Lee Fine Fashion Jewelry and I are put at an unfair advantage even though Cookie Lee Jewelry has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Cookie Lee Fine Fashion Jewelry headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been a Cookie Lee Fine Fashion Jewelry consultant for 2 years.

Originally, I became a Cookie Lee Rep because I loved their product and the integrity of what Cookie and John Lin stand for. Being a very family friendly company, it was a nice change from the corporate world. I wanted to be able to make my own hours to be able to spend time with my family **and** earn some additional money. Now my family depends on this extra income to, not only, supplement our budget, but to support our children's education. Cookie Lee is a tremendous business opportunity, and not only one that financially supports families all over the country, but has been able to change so many lives.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

Cheri Roeder
Unit Manger
Independent Cookie Lee Consultant
Cookie Lee Fine Fashion Jewelry