

First, I would like to commend the intended result of this proposal.

However, there are some sections of the proposal that I have concerns with. These provisions would impose an undue burden on the development of my business organization, while not providing any real protection for potential business partners.

While I agree that the public could benefit from protections against illegal scams, I also believe that people need to take some *personal responsibility* for their own actions, and perform their due diligence before investing their money.

Specifically, these are the items I would like to see changed:

- **§437.2(a) – “Seven Calendar Days”**

One of the keys to building a large, strong, profitable business organization is momentum. Imposing a seven day “waiting period” on registering new business partners would completely prevent the ability to generate momentum. I do not require or pressure a prospect into registering; most prospects take a day or two to review information I leave with them before making their decision. Others take more time, while some are ready to get started the same day. Providing a 100% money-back guarantee should be adequate protection to any prospect in lieu of requiring a seven day waiting period. Thus far, that has only happened once in my business (and, in fact, it was over a misunderstanding of something that had been disclosed).

- **§437.3(a)(6) – Requirement to disclose prior purchasers**

While I agree with the concept of this, the methods would be detrimental to my business and its growth, not to mention the various privacy issues such disclosure could raise. There are many different organizations that build our business using **very** different methods. For example, some organizations only allow IBOs that move a certain volume of merchandise to have direct access to the order consolidation site, whereas our organization allows all IBOs direct access. It could be very damaging to my organization if I were required to give contact information for the “nearest” purchaser, who could be in an entirely different organization, using an entirely different “system” to build the business. Personally, I do all that I can to get my prospects around as many people in my support team (“prior purchasers”) as soon as possible; it helps my business grow that much faster. However, I do not feel that providing names, addresses, and phone numbers would be of any benefit.

- **§G(a) – Lawsuits**

Unfortunately, in today’s litigious society, lawsuits mean nothing. Anyone can file a lawsuit for just about anything. Many suits are “settled” simply to minimize legal expenses, not because of any wrongdoing. It appears that the provision requires disclosure **even if the accusation was not true**; that is simply unfair, and does not present an unbiased portrayal of the business in question.