

Dear FTC,

1. I've been an Independent Business Owner (IBO) for over two years, and believe very strongly in this system of business. It offers the average American citizen an opportunity to achieve success in business where traditional business systems can not.
2. I have never been misled in any way shape of form by any other IBO about the challenges or successes faced by any of them in pursuit of their own business development. For them to do so would violate the very rules set forth by the founders of this business system. Not to mention, it would not bode well to good productive business practices. Had I been misled and registered under the false pretense of a promise based on lies a deception, I don't really believe I would have renewed my registration as an IBO twice since I initially registered.
3. I do not agree with the notion that registered IBOs should have to reveal their business income to prospective IBOs. It is really none of their business how much money I make in my personal business than it is as if I were the CEO of a large company required to reveal personal information to perspective employees. The only ones with that right, or authority are the Internal Revenue Service, my wife, and whom ever I so choose.
4. I always explain to prospects that this business is in no way a "Get-Rich-Quick" plan, that it takes both time and effort on their part to make this system work. I do that because I was told the same thing with I started, and because it's more productive to be totally transparent with prospective IBOs about how I operate as a business owner.
5. My prospects can register as an IBO for as little as the registration fee of somewhere around \$45 or with a full product sampling for just over \$200. There are multiple options for prospects in terms of registering, and I always make these options clear.

Following is my list of what I consider fair practice in regulation.

- Problem 1:
Prospects would have to wait seven days after receiving disclosures before they could register.
 - Solution:
Eliminate the waiting period, at least for opportunities like Quixtar where a prospect can get his money back if not satisfied.
- Problem 2:
Requirement to give every prospect a list of "references" – the names, addresses, and phone numbers of 10 other IBOs in the area – seven days before the prospect registers. This requirement would infringe on the privacy of every IBO whose name, address, and phone number was provided to prospects. It would also penalize the sponsor, who would be required to give his prospect contact information for 10 other IBOs, any of whom might be happy to register the prospect themselves.
 - Solution:
Eliminate the requirement to provide 10 references.
- Problem 3:
Giving every prospect a list of all lawsuits, arbitrations, and other legal claims for the past 10 years involving Quixtar and its IBOs where the plaintiff alleged fraud,

- misrepresentation, or unfair trade practices – regardless of whether or not the accusation was true. Among other problems, this requirement would open up Quixtar and other legitimate companies to false accusations. Meanwhile, dishonest companies would simply ignore the rule.
- Solution:
Eliminate the requirement to disclose past litigation.
 - Problem 4:
Making a different disclosure for every income claim. This would include any examples that might be used during an opportunity presentation to illustrate how the Plan works.
 - Solution:
If disclosures are needed, require a simple, standard, easily understood disclosure such as "average monthly gross income for 'active' IBOs."
 - Problem 5:
Requirement to provide prospects with personal financial documents to back up ("substantiate") any income claim.
 - Solution:
IBOs should possess substantiation for any claim but should not be required to disclose it except when required by the FTC and similar state agencies in an agency investigation.

Respectfully Submitted by;
Brad Richmond