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Ladies and Gentlemen:

While I appreciate the Commission's interests on behalf of consumers I believe the Business Opportunity Rule is as misguided as it is well-intentioned.

The Commission's proposed Rule stands to put an undue burden on the development of my business. It is a business I conduct with utmost ethics and moral integrity.

Those law enforcement agencies whose task is to combat fraud both know how to identify acts or practices that are unfair or deception and know the meaning of Section 5 of the Federal Trade Commission Act. **While I do not believe the Commission would expect or believe every network marketer would become conversant on Section 5 it would assuage itself of its administrative duty to combat fraud by requiring small business network marketers to take on the costly burden of print and verbal materials which would inhibit any prospect of developing a business.**

The task of combatting fraud belongs to law enforcement. The task of conducting oneself ethically and morally is the duty and expectation of business network marketers and all citizens alike. The unscrupulous and swindlers who prey on their victims will remain unfazed by the Commission's proposed Rule. It will, however, put an enormous burden on myself and all who interact face-to-face with prospects with the expectation of earning their trust and their business, and, more importantly, their alliance in our mutual quest for financial freedom through the dynamic and power of network marketing.

The Commission knows, as most anyone else, that merely because, say Microsoft, Quixtar or Exxon were sued, their overall legitimacy is not put in question. Even if an adversary should win a suit against them these companies are required to resolve the individual matter, end of story.

What the Commission must understand that for too many people who cry "fraud" against network marketing businesses is often, though admittedly not always, because the prospect of taking charge of their own business as opposed to a job is more than they are prepared to accept. Yes, there is fraud in various network marketing as in any other business, but when faced with admitting one's unwillingness, inability, or worse mis-calculation, it is better to charge "fraud" and rally societal and legal forces to their side.

What the Commission proposes is tantamount to an auto dealership informing every prospect his competitor across the street has less (or more) fraud suits against him. Whether one business has more or less lawsuits against it, when did this become the way to conduct business in our free enterprise, capitalist society?

Yes, combat fraud. Yes, be vigilant for the consumer. However, the Commission needs to take a closer look at a Rule that says (or may seem to say) a lot, but which needs much work and perhaps needs to be scrapped.

It pleases me to hear the CEO of the network marketing company I am a part consistently calling on network marketers and prospects to take the high road of ethics and morality. I would be as unique as foolish to think I were the only one hearing his words and did not seek that high road. I would be unique and foolish were I to think I alone would reject any association with someone whose thoughts were of preying on others.

It would please me to know the Commission, after further review, determined this proposed Rule is unnecessary for the harm it would create for the ethical, moral network marketers who care about what we do, how we do it and how we are perceived as doing what we do.