

Kathy Sullivan  
Lia Sophia, Advisor

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To Whom It May Concern”

**I write this letter because I have concerns regarding the proposed Business Opportunity Rule R511993. I feel that it could prevent me from my position as Advisor for the Lia Sophia Company. Sections in the proposed rule will make it extremely impossible for me to sell my products. I understand that the FTC is responsible to protect the public but feel that there are other ways that they can go about it. Not everyone is unfair and deceptive.**

**I just recently have gone through a horrible divorce and custody battle which went on for 5 years and left me with a \$25,000 attorney fee. I gave up my career many years ago to stay home and raise my six children. Being a Lia Sophia advisor has saved me. I joined because I believe in the products and needed to earn additional income. Now I am on my own and I support my children with this direct selling business. Mine and my children’s future depend on the stability of the direct selling industry.**

**The seven day waiting period to enroll a new advisor – seems to me to be somewhat confusing and an added burden. Lia Sophia’s kit at this time has a cost of only \$99.00. People buy things all the time and do NOT have a “waiting-period”. It might give false impression to someone thinking about joining. It might make them think there is reason to believe the company is not all it is said to be. It will leave room for speculation. In addition under this waiting period, I will have to keep very detailed records of when I spoke to someone about the company, and will then need to send in reports to my company 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 Lia Sophia is found guilty. Otherwise, Lia Sophia and I are put at an unfair advantage even though Lia Sophia has done NO wrong.**

**Last, 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 Lia Sophia 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 know the FTC works hard to protect consumers, but I also believe that this proposed new rule has unintended consequences, as well as burdensome alternatives available to achieving your goals.**

**Your consideration in this matter is very much appreciated. Thank you.**

**Respectfully,**

**Kathy Sullivan**