

ERIC SMALLS Financial Destination, Inc. July 14, 2006 Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W) RE: Business Opportunity Rule, R511993 600 Pennsylvania Ave., NW Washington, DC 20580 Dear Friend, I would like to express my concern about the proposed New Business Opportunity Rule R511993. The reason for my letter is to express my concern about this matter. I fear is that this new rule would dramatically hurt Financial Destination, Inc. I respect that the Federal Trade Commission has a big obligation to protect the people from unfair and deceptive acts or practices. I commend you on your work and accomplishments. I have reviewed the proposed rule and am afraid that some areas will make it almost impossible for Financial Destination, Inc. to stay in business. Financial Destination, Inc. was founded in 2004 by William Andreoli. We offer exceptional products and services to anyone regardless of their financial situation. Our mission is to help people save money, make money and create wealth. We offer credit restoration, and debt elimination services. As well as unlimited telephone consultations. We also offer tax and financial planning services. Financial Destination, Inc. or FDI is based on financial education. We have mentors that teach us how to know more about money and be smart when it comes to finances. Some of our mentors teach us about how to invest in real estate and the stock market. Others educate us on how to expand our business and become debt-free. I strongly believe that FDI is a true asset to America as it can teach people how to be better stewards over their finances. We currently have over 10,000 independent representatives with approximately over a million dollars in sales. I am not in understanding with the seven-day waiting period to enroll new representatives. Financial Destination, Inc. sales kits only cost 39.95 or 240.00. Consumers make buy things everyday that cost much more than 240.00 and are not obligated to wait seven days for something that they want and need. I see people buying TVs, microwaves, stereo systems, automobiles, and much more every day. This waiting period is unnecessary. It creates undue speculation that there might be something wrong with our product. People don't want to have to wait to buy what they already made their mind up to buy. If I'm ready to get my credit repaired I don't want to have to wait seven days for nothing. I want it now. I believe this waiting period is totally unnecessary because Financial Destination, Inc. has a 90% buyback policy for all products including sales kits purchased by people within in the last year. Under this new law Financial Destination representatives would have to keep very detailed records when a prospect makes initial contact with them. The prospect would be very interested in what Financial Destination has to offer them and need our assistance. Then we have to make them wait seven days for....? When that prospect is finally able to become a representative (if they are still interested after an entire week) then the sponsoring representative would have to retain those original records for three years. The related loss of business and administrative cost will be very expensive and will hurt the income potential of millions of American network marketers. With the rule in question, Financial Destination, Inc.'s plan would fall under FTC regulatory authority. The existing \$500.00 threshold under franchise rule will be gone and Financial Destination, Inc. will have to provide much paperwork in order to comply with the proposed rule. With the proposed rule it would not take into consideration if a company was found innocent of any prior litigation and civil or criminal legal actions involving misrepresentation or unfair or deceptive practices. The proposed rule calls for the release of any information regarding these matters. Unless Financial Destination, Inc. was found guilty we see little

results in disclosing these lawsuits. These days every is sue happy. Every time you turn around someone is getting sued and puts the tag of misrepresentation on every complaint. Some lawsuits have nothing to do with prospective distributors at all. I believe this puts Financial Destination, Inc. at an unfair advantage even though we have done nothing wrong. I think that it would be appropriate to only disclose guilty litigations that is related to the earning opportunity offered to the prospective distributor Financial Destination Inc. members would have to obtain data on time periods, demographic, and geographic information along with earnings claims. I feel that this is not a good way and would not be effective in the purpose of the proposed rule; to prevent business fraud. We believe that the business will not provide truthful date therefore this section of the proposed rule would be ineffective. Companies like Financial Destination, Inc., in attempt to be in compliance with the new laws, would attempt to provide accurate and complete information. Yet I believe that we will have a tough time trying to interpret and meet some of these requirements. The proposed rule requires the disclosure of at least 10 previous sales nearest to the prospective purchaser. The requirement to provide these references may result in privacy lawsuits that ironically Financial Destination would have to report. Financial Destination, Inc. will do everything possible to stay in compliance. Yet with identity theft on the rise these days, we would be very uncomfortable giving out personal information of our customers to strangers. If a proposed client read the following statement prior to joining Financial Destination, Inc. they may not want to become a member of our company. If you buy a business opportunity form Financial Destination, Inc., your contact information can be disclosed in the future to other strangers. Because people are very and rightfully concerned about their privacy and identity they will back away from Financial Destination, Inc. without any reason on the behalf of Financial Destination, Inc. Also, giving out this information without any controls on how it could be used will very likely and unfairly benefit our competitors. In order come up with the requirements for this proposed rule, FDI members would have to spend a lot of money and time on gathering the address of the prospective purchaser, search our database for the nearest and latest Financial Destination member, use a software program or online search to confirm this information, and then send the results off to the prospective purchaser. I believe that the FTC is working hard to protect consumers, and do appreciate your efforts. However Financial Destination, Inc. Independent Representatives believe this proposed new rule will have many unintended consequences. Sincerely, Eric Smalls Executive Associate Financial Destination, Inc.