

Prospects would have to wait seven days after receiving disclosures before they could register.

*Suggestion:*

*Eliminate the waiting period*, at least for opportunities like Quixtar where a prospect can get his money back if not satisfied.

You would be required 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.

Suggestion:

*Eliminate the requirement to provide 10 references.*

You would have to make a different disclosure for every income claim.

Suggestion:

*Eliminate the requirement to disclose past litigation.*

You would be required to provide prospects with personal financial documents to back up ("substantiate") any income claim.

*Suggestion:*

If disclosures are needed, require a simple, standard, easily understood disclosure such as "average monthly gross income for 'active' IBOs." 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.