

Savannah Meeks  
Divine Intervention Region, LLC

July 16<sup>th</sup>, 2006

Dear Federal Trade Commission,

I am writing to you to express my concerns about the proposed rule, Business Opportunity Rule R511993. While I understand that this is to protect the public from illegal, unethical, and/or unfair scams and business practices, the proposed rule has several areas that I believe will make it very difficult for those of us who are building solid, reputable, real, businesses to continue to do so.

I became an Arbonne Independent Consultant in August 2003 because I loved the products and wanted to share them with my family. However when my life situation changed a few months later, I suddenly became a single mother with a 15 month old son, I realized I could face my fears and turn Arbonne into a business by simply sharing the products beyond just my family. I have been an Independent Consultant with Arbonne for two and a half years and it has been an incredibly life changing business for me. Personally I have grown in so many areas from leadership, sales, mentoring, teambuilding, to customer service and administration. I have met mentors and developed friendships across the country. Since starting my Arbonne business, I have developed a team of 200+ independent consultants who share the same vision and work ethic to find balance with career and family and help their families live better lives.

There are several issues that would directly affect the business that I am building and have built. One is the seven day waiting period for someone to join as a consultant. I already encourage anyone I am speaking with about this business to do their proper due diligence, to use the products to make sure they like them before they sell them, to research our company and make sure it is a fit for them, to discuss their decision with their spouse or family if applicable, and I strive not to start someone until they have done these steps because I want everyone who starts a business with me, and Arbonne International, to be successful. I realize the main bulk of my business is, however, people who simply love our products, use them daily, and want to share them with their family and close friends. To have to wait seven days before they can do so, and the additional paperwork and organization required to track this properly, when I talk to many, many people everyday, seems almost overwhelming to even think about.

Another part of the proposed rule calls for the release of any information regarding litigation or lawsuits, I believe that will hurt my ability to build my business simply because of the impression that a lawsuit leaves behind. We live in a litigious society and to disclose any information on lawsuits, regardless of whether the company was found innocent, again I believe leaves a bad impression. I agree and understand the need to release this information when a company is found guilty!

And last the proposed rule requires disclosure of a minimum of 10 prior independent consultants nearest to the prospective consultant. I do not mind giving references, and since this business is word of mouth only, it is key to have satisfied and happy customers who talk and send referrals. However the proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and this is understandably a concern for anyone. I would not think that anyone would want their personal data disclosed for my business purposes; especially in this day and age of identity theft.

I appreciate and understand the great need for the work of the FTC in protecting consumers, but I do believe this proposed new rule would have many detrimental (and unintentional) consequences as mentioned above. I hope there are other ways of resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like myself, who have worked *very hard* and sacrificed much to build *solid, ethical* businesses.

Thank you for your time and understanding.

Sincerely,

Savannah Meeks