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Neither I nor millions of others would have invested in the scheme had adequate financial disclosures been in place. Amway/Quixtar present a highly deceptive "average gross income" of near \$115 a month to prospective consumer investors when my nine years experience and supporting data show an almost 100% loss rate for consumers. Internal corporate documents also reveal an approximate 96% drop out rate over five years. This appears to be to be a consumer investment pyramid in a perpetual state of collapse, supported only by the recruitment of new, unknowing investors. The sole beneficiaries seem to be the owners of Amway/Quixtar and the Kingpins distributors who make up less than 1% of the distributor force.

The Amway/Quixtar model is one that has been replicated among many other multi-level or network marketing companies. These must be differentiated from direct sales companies, which are mostly legitimate in nature. Since leaving Amway/Quixtar and exposing the fraud I have served pro bono on the boards of two consumer advocacy groups. I have been contacted by consumer victims of other multi level marketing companies, each of whom was defrauded financially in near identical multi level marketing business "opportunities". Nearly all of these consumer losses would have been avoided with appropriate disclosures.

Amway/Quixtar and its related Kingpin distributors were plagued with countless civil suits alleging fraud. Their response in the US was to force all of their distributors (consumer investors) who discover they have been defrauded into a binding arbitration process that is gagged so that the public will have no knowledge of the claims, method, manner or scope of the deceptive practices. These fraudulent practices were verified in a recent NBC Dateline undercover investigation in which I was able to gain their film crew access to public recruitment meetings.

There is a great deal at stake here. My wife, my son and I have received death threats. Quixtar has filed a legal action in an attempt to keep me from speaking to the media and further exposing the plight of its consumer investor victims. Despite this, I request a hearing on the Business Opportunity Disclosure proposed rulemaking and will be prepared to testify with documentation of the above referenced matters.

Thank you for your time.

Best Regards,

Eric Scheibeler