

Marie Clemmons

July 16, 2006

Dear Sir or Madam:

I am writing this letter about the proposed Business Opportunity Rule R511993 because I am very concerned. I believe that in its present form, it could significantly reduce my effectiveness as a business leader, and possibly prevent me from continuing as a lia sophia advisor and unit manager. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell lia sophia jewelry products.

I have been a lia sophia advisor since 1999. I joined lia sophia (formerly Lady Remington) to make some part-time money to supplement my income. I was very impressed with the company and its high standards and quality line of jewelry with a lifetime replacement guarantee. This is a very flexible job and I work it along with another job.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new advisors. lia sophia's sales kit only cost a maximum of \$149. People make purchases that cost much more than that and they do not have to wait seven days. Asking a potential new recruit to wait seven days is ridiculous. After seven days she may have lost all interest in our program. This will definitely be a setback in recruiting! Why in the world would we need such a clause incorporated? What do we have to hide? lia sophia is a very reputable company and in high standings with the DSA. Even if a person buys a starter kit to try our risk-free business, the company will buy it back at 90% if they are unhappy and do not want to pursue the business any longer.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It is indeed unfortunate that in today's world anyone can be sued for almost any reason. I believe this proposal is unfair and unrealistic to further punish a company and its individuals when clearly they have done nothing wrong and been found innocent. I feel that it would be very detrimental to my business and that of the company.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective buyer. I am not opposed to providing references, but I do feel it is unnecessary in this instance and an invasion of privacy. With this ruling I am concerned how my clients will react when they read - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." We are told almost daily to be on the look-out for identity theft and people are very concerned about their privacy. I will need to send the address of the prospective purchaser to lia sophia headquarters and then wait for the list. Because of the reputation of the company and the integrity with which I represent the products and business opportunity, prospective buyers can confidently share their information with me. I find it unnecessary that I would need to provide burden of proof that I and the company which I represent are reputable business operators.

In conclusion I urge you to consider that in my six-plus years of business with lia sophia that I have handled thousands and thousands of dollars in cash, checks and credit cards from total strangers. These customers place their trust in me and in lia sophia and we have never done them wrong! I feel these rulings would throw up a flag that might cause a potential recruit to think that there was something shady going on and a feeling of mistrust.

I sincerely appreciate the work that the FTC does to protect consumers, yet I urge you to reconsider placing this undue and unfair burden upon those of us who maintain a legitimate business while extending equitable business practices toward each of our clients and prospective buyers.

Thank you for your time in considering my comments.

Respectfully,

Marie Clemmons  
lia sophia Advisor and Unit Manager