

Response to Proposed Business Opportunity Rule  
Submitted by Susan K. Clark  
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Thank you for the opportunity to comment on the proposed Rule, and thank you for your commitment to protect those who are considering associating with a direct marketing company such as mine, Cell Tech International, based in Klamath Falls, Oregon.

I am writing in opposition to the Rule. I believe the Rule will adversely affect my business and that of the many Cell Tech business associates, for the reasons indicated bellow. Ours is an extremely reputable, reliable company, with top-notch integrity and the highest quality products, that has been in business for over 20 years. Many of our customers and business associates have been using the products and/or distributing them for many years. We are a company of great depth.

Our company is exemplary not only for these reasons, but also for its commitment to make good health available to the entire world. Its many charitable programs, and the quality of the people associated with it, testify to that. Top officers with the company have long philanthropic histories and a commitment to their local communities. I direct you to the company's website at [www.celltech.com](http://www.celltech.com) for more information.

I have been a consumer for 4 years of Cell Tech's nutritional supplements and skin care products. I was introduced to them by a very good friend whom I had known for several years. This person never pushed the business opportunity on me; I initiated it on my own after using the products for 2 years, because I was so happy with them and wanted to take advantage of the financial opportunity in sharing them with others.

The products have addressed needs that I had been concerned about for years; i.e., getting adequate nutrition to support healthy longevity; supporting my body in dealing with bone loss; and taking care of my skin.

I became a Business Associate of Cell Tech in August 2004 at my own initiative after attending Cell Tech's then-annual August Celebration, when I fell in love with the people and the lake from which our primary product ingredient, Super BlueGreen Algae, is harvested. Since that time, I have built a modest business that supports my purchase of the extraordinary products. I have goals of building this business into one that provides a greater income to replace my current job.

Building the business to the extent that I have, and preparing to build it further, has enriched my life greatly. The people I work with are wonderful, always there for me, and really care about me and my success. They are trustworthy and kind. Everyone I have met at Cell Tech, from the CEO on down to the Order Operators, is very caring. I have participated in the abundant training opportunities the company provides. I have grown and developed as a person, having to stretch myself and get out of my comfort zone to

speak to people about what I am passionate about. I have had to learn to listen to other's concerns rather than just pushing my agenda. It seems like a cliché to call it a family, but it really is—without the sibling rivalry! There is admiration and respect amongst all Cell Tech distributors.

Further, this business, and the potential it offers, provides a vehicle for me to be at work on my life's mission, which is causing a world in which all people are healthy, well, vital, and vibrant, unstoppable in the fulfillment of their dreams.

I believe that the proposed Rule would really put a damper on my business. Requiring that people wait a week to sign up as a distributor unfairly casts our business in a negative light. People are not required to wait a week to sign up as a car salesperson! As in any sales situation, it's more effective to sign people up while they are excited and enthused. Furthermore, it costs nothing to become a Cell Tech business associate—just a product purchase, of no minimum dollar amount, which is totally refundable within 90 days if they're not satisfied—and that's why they're talking to me in the first place, because they want the products. If they change their mind and don't want to be a business associate, they can revert to customer-only or non-customer status at any time with no penalty.

For a small, part-time operation like mine, an interested business associate is someone I want to get signed up right away. There are also income advantages to them to sign up as soon as possible, in the form of first-month bonuses.

I also disagree with the litigation reporting requirement in that it requires that all litigation, including winning lawsuits and settlements, be reported. This will unfairly taint our business. Most people who get interested in this kind of business aren't going to ask about that (I didn't), and putting it in the required information to be provided, is unfair.

I also think it's entirely unfair to require reference to the 10 nearest distributors in the last three years and to require people's status as a distributor to be made public. Having this notice in the sign-up papers is so discriminatory! Can you imagine someone signing up to be a Sales Representative for a major line of clothing having to agree to disclose their personal information to future sales reps? I am happy to make such information available to people who are considering my business, upon their request, and upon the agreement of the people with whom I work in Cell Tech, but I don't want it to be a requirement. All the people I know in Cell Tech are happy to have people referred to them. We help one another and care about each other's customers and business prospects.

I also think it's completely unfair to have to provide earnings information just to display a picture of a car or a boat or some other icon indicative of what people may be able to buy with their earnings. Come on now! Anyone I talk to about this business knows that there are no guarantees of income. I explain that there is a specific compensation plan that our company, in its 20+ year history, has reliably followed. I emphasize to business

prospects that their future earnings are dependent on how much initiative they take and how coachable they are.

I wouldn't sign anyone up without their being clear about how they earn the money! I tell them honestly that it does take work and that it's not a Get Rich Quick scheme. I tell them I will be there for them 100%, as will my sponsors and mentors, and that it is up to them to put in the effort. Any pictures I show or conversations I have are only designed to help people get in touch with what they want in their life. Time with family, income for investing and charitable giving, and time to exercise, are among the other kinds of benefits I may listen for people wanting.

I understand that information on earnings is something a new distributor wants to have. I wanted it too, but not in the moment of sign-up. I signed up because I TRUSTED the person who sponsored me, I trusted the products, and I trusted the other company representatives I met. That's why anyone would sign up with me as well. It's pretty hard to fake integrity, and I'm not in that business. In our company, it is well known and publicized who is doing well. These people are very visible, active, and involved in giving back to those on the way up. I am happy to share this with people looking at our business upon their request.

I think you're throwing the baby out with the bath water in proposing these Rules to apply to all direct sales companies. There may be a few bad apples in this industry, as in any industry, but I see no reason to punish the great majority because of the bad behavior of a few. Can't those firms that have demonstrated fraudulent practices be individually dealt with?

I respectfully request you withdraw the Rule. Thank you for considering my views.