

NAME: Cara Massingill

RE: Business Opportunity Rule, 16 CFR Part 437

**YOUR INFORMATION:**

While a college student, I became an independent business owner in 2002. Since graduating last year, I have been investing more time in building my business. Besides generating a small income, I have received mentorship and training from my team of fellow Quixtar independent business owners (IBOs) that has exceeded my expectations. It is very rare in the business world to find a community of people who want to help you succeed whether or not they personally profit from it. I have found such a community in my Quixtar team.

I have also been very impressed with Quixtar's high standards of business practices and product quality. That is why I am writing this letter.

Though I agree with the goal of the Business Opportunity Rule to protect people from being scammed, I am concerned that certain parts of the rule could penalize legitimate networking businesses, such as mine, without hindering those that are not legitimate.

I am particularly concerned about the following aspects of the proposed legislation:

**The requirement to provide references:**

Making the provision of references a requirement violates the basic privacy and confidentiality of the Quixtar business. I would be personally unwilling to have my name on a list that any Quixtar IBO could use for reference purposes, although I gladly give my contact information to other members of my IBO organization for reference purposes. The other concern I have with this rule is that of requiring the list of IBOs to be from my immediate area. This would prove a problem for me since I have moved to three different areas since starting my business and currently do not know 10 IBOs in my immediate area (my team is from a different town where I used to live).

**Requirement to provide a "Litigation List":**

This requirement is absurd. If network marketers are required to provide their prospects with a "litigation list," then every doctor, lawyer, CPA, plumber, contractor, etc. should also be required to provide a list of all suits filed against him/her in the past 10 years to all prospective new customers. This requirement would punish legitimate networking businesses like Quixtar, which would comply with the rule, while non-legitimate networking businesses would simply ignore the rule.