

I am a new Independent Business Owner (IBO) with the Quixtar Corporation via the Legacy Business Group. As an inner-city high school teacher, I am just like many of my coworkers looking for a way to make some extra income to supplement my below average salary for someone with a Master's degree. And via my investigations of various ethical and successful business opportunities, Quixtar offered the most potential. It not only offered money-making opportunities and high quality products and services, but leadership training, contact with other successful IBO's and a fabulous buy-back guarantee on products and even the business opportunity itself in case the prospect is not completely satisfied. Although I find it commendable that the FTC wants to protect the American consumers from charlatans, I strongly caution that the Commission doesn't impede the success of legitimate companies who already have ethical standards and policies in place that protect themselves as well as those who become involved from fraudulent and unethical behavior. I also encourage the Commission to not confuse getting a guaranteed salaried job with a business opportunity in a free capitalist society. I already have a job, and began looking for a business opportunity so that I could secure the financial future of my family members with the changes in health care costs and cost of living increases that my salaried job doesn't cover since we haven't received a cost of living raise for three years. With that being stated, there are only several problematic sections of the Commissions proposed rule. The first concern is the seven-day waiting period after disclosures. The sign up cost for the Legacy Business Group is only \$360 and comes with a buy-back guarantee for all the products and services. Ethical, reputable, and successful direct selling companies will provide this option to their IBO's because they want success for their members not fraudulent, deceiving negotiations. The progress of legitimate, ethical businesses should not be impeded upon so that the American concept of free capitalism may be protected and maintained. Therefore, I recommend that waiting period section of the rule be eliminated, at least for opportunities that offer the money-back guarantee for the business prospects. The next section that I find to be problematic is the section that IBO's must disclose substantiation of any financial claims made. First of all, I have a right to protect my financial well-being from the public in order to protect my privacy. First, my primary income as a teacher is paid by tax dollars so I can understand public knowledge of my salary, but with business, I have a right to protect my financial well-being from public knowledge. By demonstrating the formula used to calculate income potential that is applied to all IBO's should be legally sufficient. Then, with identity theft on the rise, it disturbs me that I would be responsible for connecting specific names with exact amounts that would be tempting to unethical and fraudulent beings. As much as the Commission wants to protect the consumer, the Commission should also be interested in protecting all individuals from fraudulent, unethical behavior including IBO's from ethical, reputable businesses. Therefore, I propose that IBO's should possess substantiation for any claim, but should not be required to disclose it except when required by the FTC and similar state agencies in an agency investigation. In conjunction with the previous section, there is also a problem with the references requirement to potential prospects. Not only is the Commission requesting that I provide proof to potential prospects of specific income amounts, but also, that I give those prospects specific contact information, possibly of the same individuals used as financial claims examples thus making identity theft even more accessible to potential unethical and fraudulent individuals. Within the reputable, ethical,

and successful corporations like Quixtar, potential prospects have multiple opportunities to meet and question various active IBO's of the in's and out's of the business. Business seminars, plan presentations, and one-on-one meetings are just a few of the opportunities that business prospects can take advantage of prior to making an educated decision regarding the opportunity without providing personal addresses, and phone numbers. However, providing specific contact information of a colleague without expressed consent in order to meet FTC regulations is a direct violation of personal privacy. Our business plan is very open and encouraging of making an educated decision. The Quixtar Corporation and the Legacy Business Group both offer websites with certifiable information. The business plan that is being presented under this umbrella has been IRS approved and is listed with the Better Business Bureau and has been for years. On this website one can already find a simple disclosure of average monthly gross income for "active" IBO's. So, if disclosures of this sort are necessary, then require a simple, standard, easily understood disclosure like I stated previously. I do encourage the FTC to consider carefully the wording of the proposed rule so as not to penalize legitimate business opportunities. I also urge the Commission to protect free enterprise in America, one of our greatest machines for achieving the American dream.