

18 December 2011

The President
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Attention: To whom it concerns

RE: Submission In Response To - Staff Report [10/28/2010] on Business Opportunity Rule

My name is Daniel Afoa, from Auckland, New Zealand. My wife and I got involved with ACN Inc. from April, 2007 until October 2010, approximately 3.5 years. In that time we were 100% convinced ACN, truly had the solution for our financial goals and the current financial crisis amongst other things.

We had never done network marketing before nor do we ever intend to thanks largely to the investigations and reports offered by Dr Jon Taylor into the industry.

When we were no longer with the company I began to study the statistics presented by Dr Taylor, in particular, the abysmal failure/success ratio of MLM's generally. The numbers matched our personal experience and also our overall team of approx 350+. In 3.5 years, we made many sacrifices, personal, financial, professional and social, willingly in the pursuit of the big picture dream. Nothing or no-one was going to stop us from getting to where we were "destined" to go, what we came to believe we could achieve with ACN.

We did not achieve the top positions of the company, nor did we make any real money, our commitment was extreme to the point we ignored all warning signs of personal financial ruin. Below are my calculations of our financial costs with ACN.

ITEM	COST	RUNNING COSTS
REGISTRATION FEE	\$396	\$396
RENEWAL FEES – 2008, 2009, 2010	\$167.50 X3 = \$500 approx. (rounded)	\$896
INTERNATIONAL EVENTS REGISTRATIONS , (2007-2), (2008-4 incl. Anaheim), (2009-4 incl. Detroit), (2010-2) Daniel 12 events; Hanah 10 events;	\$150 ave X 22 = \$3300	\$4196
EVENTS travel/accomodations 22 @ \$1400 average	\$30,800	\$34,996
Product purchases , product usage, merchandise, monthly subscriptions, weekly event costs, monthly costs etc..	\$18,200 approx.	\$53,196
**LOSS OF INCOME (from Sept 2008-Oct 2010) Daniel @40 hours per week x 100weeks approx. @ \$180p/h Note: (80+ hours per week working ACN business) Note: hanah's time not included in calculation	\$7,200 p/w X104 weeks = \$748,800 approx.	\$801,996
LESS TOTAL INCOME FROM ACN 2007, 2008, 2009, 2010	\$5000 Approx.	\$796,996 TOTAL LOSS (approx)

Being a normally logical and grounded individual, I was indifferent to the hype and overly charismatic nature of the business, especially in public presentations. I looked past this down point, and concentrated on the larger mission at hand of changing my world around me. The more I immersed myself with conferences and training programs, my belief in the company and its system grew to the point of non-negotiability.

Here are some examples of the phrases and constant reiteration by the company and it's senior representatives, that sold me.

- **"ACN cares for it's people"**, *(Co-Founders)*
- **"There is no other Company** like ACN", *(Debbie Davis, Senior Vice President)*
- **"Don't let people steal** your dreams", *(Debbie Davis, Senior Vice President)*
- **Anybody can make it in ACN"**, *(Brian Sax, Senior Vice President)*
- **"Your life can go from tragic to magic in a short time"**, *(Greg Provenzano, President)*
- **"We will not get rich at the expense of the masses"**, *(Greg Provenzano, President)*
- **"We wanted to create** a company that looked after the representatives", *(Mike Cupisz, Co-Founder)*
- **There was no cost** for the customer to join and I would be offering a better value service with one of the most well respected companies on the planet, *(Eugene Piccinotti, Senior Vice President)*
- **My advice to anyone getting started** is create a personal vision for your success, make sure that this is 'other people centred, *(John Grant, Regional Vice President)*
- **With ACN I have absolutely no financial risk.** I can work to my own agenda and reap the financial and emotional rewards as my business grows. I am now in the position to provide my teams with the tools to make a real difference in their own lives, which, to me, means the most. *(Bettie Davis, Regional Vice President)*
- **But I would have to say** the best thing about ACN is that it allows me the freedom to spend time with family and friends while building my ACN business." *(Keith & Colleen Janke, Regional Vice President)*
- **At this stage in the game** I have the luxury to choose who I work with, I choose to work with ACN because I believe in ACN" ..., *(Donald Trump)*
- **"...they're going** to work with you, everybody loves that, so use that, take advantage of that..." *(Donald Trump)*
- **Sacrifice some leisure time,** TV time, personal time and family time so that you can make ACN work in a big way. If you do, the time you sacrificed will pay you back with even more time to enjoy your life. *(Mike Bisutti, Senior Vice President)*
- **New representatives need to** take this business as serious as a heart attack. It's simple but the work must be done. Trust the leadership and be coachable. I was 100% coachable and I'm enjoying the fruits of being 100% coachable. I simply observed the people that were where I wanted to be and copied them. If you want what successful people have, just do what successful people do. *(Spencer Hunn, Senior Vice President)*

The problem, well, I'm sure the figures above speaks for themselves. Of the 350+ people that were in our team, based on the bonuses and pay structure we were the highest earners in the team. Most of

these people spent money chasing the dream as well, not to the extent that we did, but they certainly paid out a lot more than what they got back, if any.

The analysis by Dr Jon Taylor in his book, "The Case for and against Multi-level Marketing", is in my opinion 100% factual based on my experience, the team we built and the many hundreds of people we got to know within the company.

ACN and NW marketing, is a universal tragedy that has caused much damage within families, communities and social groups. In every known case to me personally, the relationships between the distributor/representative with their families and friends are strained at best whenever an individual starts to pursue their warm market. ACN preaches that we "...they are only interested in the warm market list...", this is the doorway to continuous recruiting.

I fully support Dr Taylor and others who are making a stand against this roguish predator, with no regard to the damage it leaves behind. We are piecing our lives together after the fact as are thousands and millions that found themselves in similar predicaments. We are in danger of losing our home and financial ruin because of it.

Yours truthfully

Daniel & Hanah Afoa

****LOSS OF INCOME**

- (from Sept 2008-Oct 2010) 95% ACN / 5% private business
- Loss of income from my architectural design and construction business