

Kristi Onofre
Cookie Lee Jewelry
Independent Consultant
Director II

July 5, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madame:

I am writing this letter because I am concerned about the proposed business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Cookie Lee Jewelry Consultant. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Cookie Lee Jewelry products.

I am **opposed** to this Business Opportunity Rule. One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new consultants. Cookie Lee Jewelry's option one start up cost is only \$350.00. People buy TV's, cars, and other items that cost much more than that and they do not have to wait seven-days. This waiting period gives the impression that there might be something wrong with the plan. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Cookie Lee Jewelry and will have to send in many reports to Cookie Lee Jewelry.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Cookie Lee Jewelry is found guilty. Otherwise Cookie Lee Jewelry and I are put at an unfair advantage even though Cookie Lee Jewelry has done **nothing** wrong

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the

references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Cookie Lee Jewelry headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a consultant, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been a Cookie Lee Jewelry Consultant for more than three years. Originally I became a Cookie Lee Jewelry Consultant strictly for the discount since I had to support my bad habit of buying jewelry! But after I kept getting compliment after compliment I thought maybe I could make some extra money selling it. Since Cookie Lee Jewelry was so new to Ohio there were hardly any Consultants here. I new it would be fun and great to make some extra money each month, but I had no idea at the potential that was waiting for me. I have made countless friendships, made great money, won incredible trips and have introduced this incredible opportunity to twenty-two women! I can't tell you how much I treasure this business and what it does for me as well as all the wonderful women in my group! I am a single parent struggling at a very low income job – still looking for a better one, in the mean time my Cookie Lee Business has kept my family afloat in the difficult weeks and months where my "real job" income won't pay all the bills. My family now depends on this extra income to supplement our budget.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

Kristi Onofre