

January 12, 2011

FTC

Re: MLM marketing practices.

Please share these comments with any and all who may benefit.

I have spent the last 30 years actively involved in the insurance, investment, and general financial services industry. I have been involved as a supervisor, securities principal, and compliance officer. As such I have and still do find it amazing that having lived in such a compliance, and consumer protected industry, that the MLM industry has little or no regulations.

If we were to try and market any of the MLM programs I am aware of to our clients we would immediately be fined and censured. In fact our Broker dealer forbids any registered representative from participating in any MLM activities.

I would strongly urge all of you to take a serious look at this industry and try and not be swayed by the hype, but look at the facts.

Dr. Taylor has done a suburb job of balanced research and reporting. If he had time I would encourage a comparison of the dollars lost in the MLM industry to the Fraud we experience in the financial services world. My guess is that there would be found many multiples more lost in the MLM world than in our highly regulated financial services industry. It just does not get the press coverage.

Thank you for your efforts and desire to do the right thing.

Sincerely,

Calvin D. Welling CLU, ChFC, CFP