

My wife and I have been Independent distributors with XanGo™ LLC for the past 11 months and have been actively working the business of XanGo™ for the past 5 months. I was formerly the General Manager of a retail department store and have recently made the decision to leave that industry and pursue XanGo™ full-time. I made this decision very cautiously based on the experiences my wife and I have had over the past 11 months with XanGo™. We have 4 young children and we cannot afford to be rash with any decisions we make.

XanGo™ represents to us the perfect opportunity to share with others while giving back to our own family both with our time and their health and well-being. I have been amazed at the ethics of XanGo™ corporate and the distributor force in my involvement and have never felt more proud to be affiliated with a company.

While I recognize the reasoning behind the proposed policy R511993, I am concerned that these policies will be debilitating to our business efforts. First and foremost is the policy regarding disclosure of nearest purchasers-- we are very careful with regard to our personal information given that we have young children. We do not feel it is necessary to share more than our business name and if we choose, we may decide who has access to additional information. We are not comfortable providing the contact information of other purchasers or distributors in the area either. If this information was put into the wrong hands intentionally or otherwise this could place an unnecessary liability on a distributor or the company, not to mention the potential harm to a person that could result. Our business is home-based and we don't feel our rights protecting our personal information should be any less than the rest of the public simply because we choose to operate our business from home.

The 7-day waiting period proposed would also have long-reaching effects on our ability to conduct business with would-be clients and business associates. As distributors or marketers for Xango™ our job is to assist people in making a purchase from the company. The \$35 fee to become a distributor is hardly a risky amount of money that requires seven days of consideration. This waiting period also would delay the purchase of product. If I want to purchase a Dell ® computer I would be furious if I had to wait seven days before my purchase could actually be made, I might need the product in 2 days. With XanGo™ offering a money-back guarantee within 30 days of purchase we feel that anyone who becomes involved with our company is already sufficiently protected. A seven day waiting period is an impractical time frame to expect a customer to wait before being able to receive product if they desire to do so, not to mention the mounds of unnecessary paperwork it would create.

While we personally have no problem disclosing our lack of legal actions in the past 10 years to others, we don't see how this is beneficial. Those persons who are dishonest and more likely to have had legal troubles in the past will continue to be dishonest and provide less-than-honest disclosures to others. The fact that this information is being required regardless of the outcome could bias a person's decision to be involved unjustly. We have the same opinion of earnings disclosures. This information could all be altered to look better than it is in the hands of a dishonest person.

In summation, we implore the FTC to consider the backlash of these policies. The changes outlined in this proposed policy will be significant to the XanGo™ business my wife and I

operate. It could likely force decisions upon us that would thrust me back into the traditional workforce and take me away from my family and children which is where I belong. XanGo™ is an honest and upstanding business and deserves to be promoted freely to a consumer's world with sanctions placed only against those who act dishonestly in extreme cases. Please do not cripple the honest business men and women of the direct selling industry to address the dishonest element that exists not only in direct sales, but all business model types. Please keep in mind when developing new policies that we want the dishonest element removed as much as, if not more so, than the FTC as they impact our ability to do business.

Respectfully,
Ryan Heaps
Independent XanGo™ distributor