

To Whom It May Concern:

I have been an Independent Business Owner for Quixtar for a little over 2 years. I have had a great experience doing business with Quixtar. Everything they claim they backup by action, from money back policies, to payment of checks. The Crowe Team (which I am now a part of) disclosed the vital details of this business before I got started and I now follow that same process. I see no need for changes in the rules.

Prospects would have to wait 7 days after receiving disclosures before they could register. Quixtar already has a money back guarantee for a year. I see no need for a waiting period.

You would be required to give every prospect a list of "references" – the names, addresses, and phone numbers of 10 other IBOs in the area – seven days before the prospect registers. This requirement would infringe on the privacy of every IBO whose name, address, and phone number was provided to prospects. It would also penalize the sponsor, who would be required to give his prospect contact information for 10 other IBOs, any of whom might be happy to register the prospect themselves.

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You would have to make a different disclosure for every income claim. This would include any examples you might use during an opportunity presentation to illustrate how the Plan works. If disclosures are needed, require a simple, standard, easily understood disclosure such as "average monthly gross income for 'active' IBOs." We already provide this information to every prospect. We call it the 6,4,2 business model.

You would be required to provide prospects with personal financial documents to back up ("substantiate") any income claim. IBOs 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.

Thank you for your time.

Sincerely,  
Doug Evans