

Stacy Gagliardi
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June 30, 2006

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

Dear Sir or Madam:

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 an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong with the Arbonne opportunity. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business.

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. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business

relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for more than two years. I became a Consultant because I love the products and our family was in need of a second source of potential income. Since starting my Arbonne business, I have developed a team of around 50+ Independent Consultants across the country and together we are helping our families enjoy better lives. If you had asked me, "Where do you see yourself in a year?" I would have never imagined I would be here. I was a stay-at home wife and mother of two, living what I considered the life I was meant to live. My story begins with my best friend and husband, Dave, who started out as my pen pal while serving in the Navy. After five months of e-mails and phone calls we met face-to-face and, well ... there is such a thing as love at first sight! We were married at a young age and with the financial stability of the military, having a family seemed so wonderful. A year-and-a-half later I became pregnant with our baby girl, Katelynn. Dave was in the Persian Gulf for most of my pregnancy and when 9/11 happened, I was ready to have him home. We were blessed once again with our beautiful son, Zach. After his term was over, he began his job along with the crazy hours.

I love my husband so much for how hard he worked to support our family so I could be that stay-at-home mom I always wanted to be, but once again I was ready to have him home. It hurt me to think Dave would not get to experience all those wonderful things our children do while growing up. I was looking for a way to keep myself at home with the kids, and aside from being a successful wife and mom, I wanted to have my own accomplishments. My sister-in-law, Beth, was also hoping for the same thing for her family.

In February 2004, Beth called me and asked me to join her in Arbonne. I thought she was crazy, but I said "Yes." I had no intention of actually doing it. Zach was only 2 months old, and Katelynn was 1-and-a-half years old. How could I do this with two very dependent babies? Beth said she would be in town, so I set up my Presentations to see what it would be like. I stepped out in blind faith last February to follow Beth into this business. I have grown spiritually in many ways! The road was not easy with my long distance upline and the lack of support from my family. But the ones who felt they were protecting me in the beginning are now my biggest cheerleaders and I give thanks for how our relationships have grown. I am overwhelmed by the love and support from my friends, family and incredible Region. Most importantly, I am blessed by the relationship that has grown between Dave, Kate and Zach.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I

hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Stacy Gagliardi