

Jamie Shaver- Independent Consultant, Executive Regional Vice
President with Arbonne International
Shaver Inc.

July 4th, 2006

Dear Sir or Madam:

I am writing this letter because I am very concerned about the proposed Business Opportunity Rule R511993. I believe the way it is currently stated that this rule could prevent me from continuing as an Arbonne consultant. Although I agree that it is important to protect the public from “unfair or deceptive acts or practices” I do feel that the proposed rule would be too extreme and would actually prevent businesses to ever market or sell product through network marketing. I believe it would be nearly impossible to sell Arbonne products and sponsor people into the business with such stringent rules in place. After learning about this proposed rule I tried to put myself in both the shoes of the consumer looking to buy products, and the person that I was 2 years ago that was looking for a way out of massive debt. This proposed rule would scare people and inevitably steal the opportunity from millions to make a difference in their lives both financially and on a personal growth level. That is unfair.

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 small amount of money (\$29), the proposed waiting period gives the wrong impression that there might be something wrong with the Arbonne opportunity. I believe this requirement would make detailed record keeping a nightmare, plus we live in a “right now,” “real-time,” kind of world. People don’t want to wait to get their businesses started or to be enjoying their Arbonne products. We already have a “right to cancel” policy in place that allows people time to cancel and/or change their mind without penalty if they choose. A 7-day waiting period would limit my ability to grow my business.

The release of ANY information regarding lawsuits involving misrepresentation, or unfair or deceptive practices regardless if the company was found innocent is

absurd! That is a “false warning” and would mean that anyone could file a lawsuit to damage and flout a company’s image because the outcome doesn’t matter!! This type of information would incorrectly imply wrongdoing and is a misrepresentation of information in itself. Unless Arbonne has been found guilty of something, this information is irrelevant and would damage the livelihood of many consultants that have done nothing wrong.

Lastly, the proposed rule requiring the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant would be an invasion of privacy. I believe it would make us a target for identity theft, and I’m very uncomfortable giving out personal information about individuals without their permission or knowledge to strangers. I am glad to provide references, but using language that says “if you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers” is a major cause for concern. Who’s doing the background checks on the people getting the information? We would have to send the information to the corporate office in California and then wait for the list. Sharing this type of information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors! This like the other proposed changes is unfair and I find this to be an invasion of privacy and not necessary in the pursuit to protect consumers.

I have been an Arbonne consultant for almost 3 years. I became a Consultant because I love the philosophy of Arbonne, their products, leadership and integrity of the people I work with. Our family was looking for a way out of credit card debt, student & business loans that were taking a toll on our family life. We were in need of an income potential that would still allow me to be at home with our 3 kids. Since starting my Arbonne business, I have developed a team of hundreds of Independent Consultants across the country and together we are developing as stronger, more confident leaders that are serving others to help make others’ lives better. I have personally become more confident, outgoing, generous and have learned the definition of “servanthood.” My involvement with Arbonne has made me a better mother, friend and wife and I’m afraid that this proposed rule would ruin the chance for millions of others to become better people.

In conclusion, I appreciate the work of the FTC in protecting consumers. I believe this proposed new rule would have a detrimental consequence. There has got to be alternative means to resolving the outstanding issues at hand without unfairly targeting legitimate direct selling businesses and inadvertently harming the livelihood of millions of successful network marketers, like me. Thank you.

Sincerely,
Jamie M. Shaver