



Laura Smith <lsmith@truthinadvertising.org>

Resorts360 Vacation Club - second follow-up

Laura Smith <lsmith@truthinadvertising.org>

Tue, Mar 25, 2014 at 9:36 AM

To: jrich@ftc.gov

Cc: lgreisman@ftc.gov

Dear Ms. Rich:

I am writing to follow-up again on our [May 2013 letter](#) to your predecessor, Charles Harwood, regarding Resorts360 Vacation Club, a Washington-based company that is operating an illegal pyramid scheme.

We have received consumer inquiries regarding the status of this matter, which we brought to the FTC's attention over 10 months ago, and which was the subject of a petition that was signed by over 5,000 consumers.

As explained in our May 2013 letter, as well as our [September 2013 e-mail](#), the company's compensation program is based exclusively on providing payments to members for the recruitment of new participants, not on the retail sale of products or services. The company also claims that those who buy into the program are likely to make a substantial income, when, in truth, most consumers who become members are not likely to make any money at all.

We once again strongly urge your office to address this matter quickly in order to protect consumers from Resorts360's illegal scheme and deceptive marketing. As is evidenced by the large number of consumers who have signed the petition to date, as well as recent inquiries received by TINA.org, this is a matter of significant public importance.

Sincerely,

Laura Smith

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