InRe

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

CIVIL INVESTIGATIVE DEMAND DATED AUG 22,2008

PETITION TO QUASH OR LIMIT
CIVIL INVESTIGATIVE DEMAND DATED AUG 22 2008 FILE NO. 0823224

Background

Makri Inc. is engaged by timeshare resorts in the Unites States to bring visitors to their timeshare locations on vacation. The intent is so that the visitors might purchase timeshares during their visit if they do like the product.

To this effect, Makri Inc. is given accommodations by the resorts at a discounted rate. The locations are packaged together into a sample "5/4 Orlando, 3/2 Daytona, 4/3 Bahamas cruis3c_

Per our contract with the third party seller, (3b & 3C of contract) they have to confirm to the laws in the jurisdiction of sale, therefore we insisted they do the same. Global Communication Solutions (the third party seller) informed us that the cost of complying with the law is cost prohibitive and were unwilling to do the same. Therefore, we stopped doing business with them shortly after.

We enforce the contract strictly with the entities we do business with. There have been no new sales to Australia of travel packages through telemarketing for many months because of the compliance issue.

Conclusion

We received the Civil Investigative Demand and Requestfor Documentary Material on August 26, 2008.

Per the Civil Investigative Demand Schedule for production of documentary materials, we were to call the FTC for any clarification. Mr. John DeMarco from my office made calls to the FTC offices as indicated in the schedule for production for documentary materials but has not received any clarification from the FTC offices so far.

After receiving your request, I have contacted the third party call center to receive items requested in the list. I have not received any information from them so far. My communication to them is being ignored because we are no longer doing business with them.

In the Civil Investigative Demand Schedule for production of documentary materials we are to produce a list of items 1 through 10. All these items relate directly to the telemarketing activity that we were not engaging in.

We have in our possession and can provide:

1) Information on the entity that actually made the calls including our signed contract with them.

2) Our communications with the ACMA (Australian Communications and Media Authority)
3) Any other information within our possession.

However we are not in possession of any details on the calls themselves.