



May 15, 2013

VIA FEDEX

Rodger Rutter
Founder, Chief Executive Officer
Resorts360 Vacation Club
1201 E. Yelm Avenue, Suite 196
Yelm, WA 98597

Re: Resorts360 Vacation Club Pyramid Scheme

Dear Mr. Rutter:

I am writing to you on behalf of Truth in Advertising, Inc., a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We have found that your company, Resorts360 Vacation Club, LLC, has been operating a pyramid scheme, as the member 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.

Pyramid schemes are illegal pursuant to 15 U.S.C. § 45(a) and Revised Code of Washington §19.275.030 because they are inherently injurious to consumers as they are inevitably doomed to collapse. However, Resorts360 does not alert consumers to this fact. Rather, consumers are deceived into believing that they can earn large incomes if they purchase one of the company's expensive memberships.

Truth in Advertising, Inc. is requesting that Resorts360 cease and desist its illegal pyramid scheme. We are also notifying the Federal Trade Commission, the Washington Attorney General, and the Better Business Bureau of Resorts360's marketing and business practices. The letters we are sending each of these entities are available on our website, www.truthinadvertising.org/resorts360/.

If you have any questions or comments, please feel free to contact me.

Sincerely,

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.