



STATE OF WISCONSIN
DEPARTMENT OF JUSTICE

JAMES E. DOYLE
ATTORNEY GENERAL

Burneatta L. Bridge
Deputy Attorney General

114 East, State Capitol
P.O. Box 7857
Madison, WI 53707-7857

March 30, 2000

Conde Nast Publications Inc.
350 Madison Avenue
New York, NY 10017

Dear Publisher:

Seven young people were killed and five others were severely injured in a minivan crash near Janesville, Wisconsin on March 25, 1999. All of them were working for a subscription sales company known as Y.E.S.L.C., DeWitt, Iowa. This company sold subscriptions that were processed by Subscriptions Plus, Inc., formerly of Bethany, Oklahoma (now based in Rock Island, Illinois).

My office has undertaken an extensive investigation into the circumstances surrounding that accident. Our investigation has revealed that **Allure** was one of the magazines being sold door-to-door by juveniles, with little supervision and in conditions that put them at great risk. My office has filed a criminal complaint against Y.E.S.L.C. and its owner/manager, Choan Lane. We also have filed a civil lawsuit against Y.E.S.L.C, Lane, Subscriptions Plus, Inc., and its owner, Karleen Hillery

Our complaints document a pattern and practice of illegal conduct and deception in the marketing of your magazine. Unfortunately, last year's accident in Wisconsin was not an isolated incident. Other young people and adults have been killed in other states while working for itinerant magazine sales crews. Young people are recruited to sell your publication with promises of extensive travel, wealth and college scholarships. Once employed, they are treated like animals. Our investigation found that they were poorly fed, inadequately housed and dangerously transported. Moreover, our criminal complaint alleges that the children selling your magazines were exposed to alcohol and other drugs, and given sales incentives to obtain marijuana and hashish for others in their sales crew.

As a major publisher, you have the ultimate responsibility for the way your magazine reaches the public. You also control the purse strings because you pay these companies for obtaining new subscriptions. Clearly, you are in the best position to ensure that these companies obey the law and do not risk the lives of the children representing your product.

This letter and the attached complaints should serve as official notice that your magazine was sold in Wisconsin by juveniles through illegal and deceptive practices. In light of the information detailed in our criminal and civil lawsuits, I urge you to refuse to accept any subscriptions obtained by Y.E.S.L.C., Subscriptions Plus, Inc., their successor companies and

Conde Nast Publications Inc.

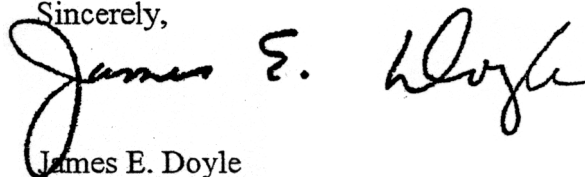
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any other subscription service that uses child sales crews to market magazines door-to-door. If you continue to accept these subscriptions, I will be forced to assume that you are condoning, approving and encouraging these practices. Lack of action on your part could have serious legal consequences in Wisconsin and other states that limit the use of children in unlicensed door-to-door sales.

I hope that you share my concerns and those of other law enforcement officials around the country. I encourage you to put the welfare of children and the welfare of your subscribers ahead of a few extra subscriptions.

Sincerely,

A handwritten signature in black ink that reads "James E. Doyle". The signature is written in a cursive style with a large, looping initial "J".

James E. Doyle
Attorney General

JED:bn

Enclosures

ID	Name	Publisher	Address	City State Zip	Phone	Fax
1	Allure	Conde Nast Publications Inc.	350 Madison Avenue	New York, NY 10017	212-880-8800	212-880-8287
2	American HomeStyle	Gruner & Jahr U.S.A. Publishing	375 Lexington Avenue	New York, NY 10017-5	212-499-2000	212-499-1617
3	Automobile Magazine	PRIMEDIA Consumer Magazine	575 Lexington Avenue, 24th	New York, NY 10022	212-891-6360	212-826-2911
4	Child	Gruner & Jahr U.S.A. Publishing	375 Lexington Avenue	New York, NY 10017-5	212-499-2000	212-499-6740
5	Computer Shopper	Ziff-Davis Publishing Co.	One Park Avenue	New York, NY 10016	212-503-3500	212-503-3995
6	Details	Conde Nast Publications, Inc.	632 Broadway, Penthouse	New York, NY 10012	212-598-3710	212-598-0284
7	Elle Décor	Hachette Fillipacchi Publications, I	1633 Broadway	New York, NY 10019	212-767-5800	212-489-4241
8	Electronic Monthly Ga	Ziff-Davis Publishing Co.	50 Beale Street, 12th Floor	San Francisco, CA 94	415-547-8771	
9	Esquire	Hearst Corporation	250 West 55th Street	New York, NY 10019	212-649-4020	212-649-4050
10	Field & Stream	Times Mirror Magazines, Inc.	2 Park Avenue	New York, NY 10016	212-779-5000	212-779-5466
		Gucione Media LLC	450 West 15th Street, Ste. 5	New York, NY 10011	212-771-7000	212-627-3168
12	Home	Hachette Fillipacchi Magazines, In	1633 Broadway, 44th Floor	New York, NY 10019	212-767-6811	212-767-5600
13	Love Cats	Grass Roots Publishing Co., Inc.	450 Fashion Avenue, Ste. 1	New York, NY 10123-	212-888-1855	
14	Jack and Jill	Children's Better Health Institute	Box 567, 1100 Waterway Bl	Indianapolis, IN 46202	317-636-8881	317-684-8094
15	Jane	Conde Nast Publications Inc.	7 W. 34th Street	New York, NY 10001-	212-630-3900	
16	MacWorld	Mac Publishing, L.L.C.	301 Howard Street			415-442-0766
17	Maxim	Dennis Maxim, Inc.				212-302-2635
18	Joe Weider's Men's Fit	Weider Publications	21100 Erwin Street	Woodland Hills, CA 9	818-884-6800	818-704-5734
19	Mirabella	Hachette Fillipacchi Magazines, In	1633 Broadway, 44th Floor	New York, NY 10019	212-767-6000	212-447-4762
20	Motor Trend	Emap Petersen, Inc.	6420 Wilshire Blvd.	Los Angeles, CA 9004	323-782-2000	323-782-2866
21	New Choices	Reader's Digest Association, Inc.	260 Madison Avenue	New York, NY 10016	212-696-2303	212-696-5031
22	Outside	Marah Media Inc.	Outside Plaza, 400 Market	Sante Fe NM 87501	505-989-7100	505-989-4700
23	Parenting	Time Publishing Ventures	1325 Avenue of the Americ	New York, NY 10019	212-522-8989	212-522-8750
24	PC - Computing	Ziff-Davis Publishing	50 Beale Street, 13th Floor	San Francisco, CA 94	415-547-8000	415-547-8074
25	PC Magazine	Ziff-Davis Publishing Co.	One Park Avenue	New York, NY 10016	212-503-5100	
26	Photographic	Emap Peterson, Inc.	6420 Wilshire Blvd.	Los Angeles, CA 9004	323-782-2000	323-782-2467
27	Popular Science	Times Mirror Magazines, Inc.	2 Park Avenue	New York, NY 10016	212-779-5000	212-481-8062
28	Reader's Digest	Reader's Digest Association, Inc.		Pleasantville, NY 1057	914-238-1000	914-244-5994
29	Rolling Stone	Wenner Media, Inc.	1290 Avenue of Americas	New York, NY 10104	212-484-1616	212-759-2966
30	Shape	Weider Publications	21100 Erwin Street	Woodland Hills, CA 91	818-884-6800	818-704-5734
31	Skin Diver	Emap Petersen, Inc.	6430 Wilshire Blvd.	Los Angeles, CA 9004	323-782-2000	323-782-2467
32	Spin	Vibe - Spin Ventures	205 Lexington Avenue, 3rd	New York, NY 10016	212-231-7400	
33	Sport	Emap Petersen, Inc.	6420 Wilshire Blvd.	Los Angeles, CA 9004	323-782-2000	323-782-2467

ID	Name	Publisher	Address	City State Zip	Phone	Fax
	Teen	Emap Petersen, Inc.	6420 Wilshire Blvd.	Los Angeles, CA 9004	323-782-2000	323-782-2467
35	Today's Homeowner	Times Mirror Magazines, Inc.	2 Park Avenue	New York, NY 10016-	212-779-5000	212-725-3281
36	Turtle	Children's Better Health Institute	Box 567, 1100 Waterway Bl	Indianapolis, IN 46202	317-636-8881	317-684-8094
37	TV Guide	News America Publications, Inc.	100 Matsonford Road, Box	Radnor, PA 19088-09	610-293-8500	610-688-6216
38	US News & World Rep	U.S. News & World Report Inc.	450 West 33rd Street	New York, NY 10001-	212-716-6800	212-916-7400
39	Yahoo Internet Life	Ziff-Davis Publishing Co.	One Park Avenue	New York, NY 10016	212-503-4804	212-503-5699

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*W/pt
cc BLB
SED, JH*
~~NEW YORK~~ GREENWICH
NEWARK
LOS ANGELES
PALM BEACH

May 3, 2000

James E. Doyle
Attorney General
State of Wisconsin
Department of Justice
114 East State Capital
P.O. Box 7857
Madison, WI 53707-7857

Re: Janesville Accident

Dear Attorney General Doyle:

Magazine Publishers of America ("MPA") is the trade association for consumer magazine publishers. On March 30th you sent a letter to a number of MPA member publishers relating to the legal proceedings that your office has recently commenced growing out of the horrific automobile accident that occurred on March 25th of last year near Janesville, Wisconsin. A minivan carrying a magazine sales crew of twelve people, two or three under age eighteen, went out of control, resulting in the death of seven of the occupants and serious injury to the others. Inasmuch as you have sent similar letters to several of MPA's members, presumably those that had one or more magazines on the list being sold by that crew, and inasmuch as the incident poses an industry-wide matter of great concern to all publishers, we are undertaking to respond on behalf of our members.

Based on our inquiry, we believe that none of our members have authorized Y.E.S.L.C. or its principal owner, Choan Lane, to represent them or to sell their magazines, and to the best of our knowledge only a very few publishers authorized Subscriptions Plus to process magazine orders on their behalf. Those that had authorized Subscriptions Plus immediately terminated that authorization upon learning of the company's business practices. The magazine industry is very sensitive to the potential for abuse that can occur by door-to-door sales agents. The industry is aware of the fact that abuses have occurred from time to time, and substantially all of MPA's member publishers have taken steps to disassociate themselves and their magazines from road crew agents known to have acted unethically or to have violated the fair labor

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practices laws or the consumer protection laws of the various states. Most of MPA's member publishers to our knowledge have made it a practice not to knowingly accept business directly from companies that operate road crews. MPA believes that the volume of subscriptions sold in this manner involving MPA member titles has dropped significantly over the years and today represents less than one percent of subscription sales.

Unfortunately, it is virtually impossible for any magazine publisher to prevent a determined, unauthorized selling agent - road crew, telemarketing or otherwise - from selling the publisher's magazines. Orders are processed through other agents and the identity of the selling agent is quickly lost. MPA in an effort to combat abuses by subagents has worked with the Federal Trade Commission to develop industry self-policing guidelines that are intended to help identify subagents that the publishers have not specifically approved. Enclosed is a copy of the MPA's most recent guidelines that were promulgated in 1998. These guidelines have been helpful in identifying non-authorized subagents, and we are told that consumer complaints have gone down since these guidelines were implemented.

The suggestion in your letter that magazine publishers either benefit from or tacitly support unscrupulous sales agents is simply not the case. To the contrary, magazine publishers see such unethical agents as a serious problem. Although undoubtedly some subscriptions sold by unethical sales agents beyond the control of publishers add to publishers' subscription lists, the figure is believed to be very low. Conversely, the magazine publishing industry is plagued by unethical agents that sell subscriptions and then do not submit them to the publisher, even indirectly through the complex network of subscription processing agents. Agents that have difficulty processing their orders frequently keep the subscription money and defraud both the consumer and the publisher. Publishers are plagued by irate consumer calls that purchased subscriptions have not been delivered. In a substantial percentage of those cases the publishers received no payment and have no record of the subscriber, but for public relations purposes are compelled nonetheless to fill the subscription. In sum, the industry sees such agents as a plague, not a benefit. To date it has received only tepid support from prosecutors willing to proceed against such fraudulent but elusive agents. Agents of that type are quick to disappear when they are under scrutiny, only to reappear later under a different name and at a different location.

The publishers would like to work with state and federal regulators to have a central clearing house of agents that are believed to be unethical or that violate the law. For antitrust reasons MPA has been unable to create such a list for fear that that would be deemed an unlawful boycott.

The MPA has had an ongoing dialog with the Federal Trade Commission to help minimize consumer fraud in the area of telemarketing. We have had some constructive dialog with the Inspector General's Office of the U.S. Postal Service to deal with

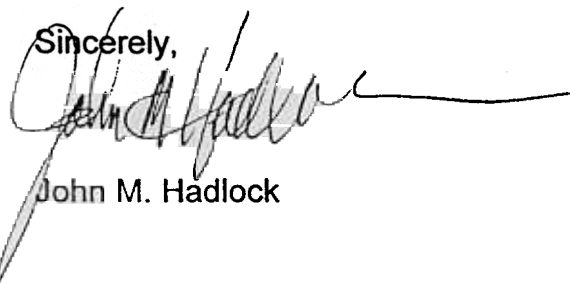
James E. Doyle

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unlawful direct mail agents. We expressed our willingness last year to work with your office concerning unlawful and unethical magazine road crews. I personally called William Hanrahan of your office to talk about it, as well as to talk about what could be done for those that were injured. He acknowledged that to me again this week and acknowledged that we have been more cooperative than the letter suggests. We continue to welcome any constructive suggestion.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Hadlock", with a long horizontal flourish extending to the right.

John M. Hadlock

JMH/cmr
Enclosure