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Ms. Patricia Kuntz

International World of Vacations

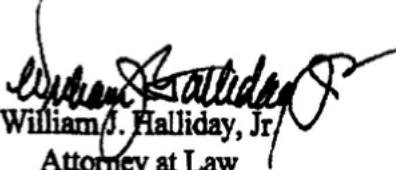
Re: Legality of International World of Vacations Marketing Plan

Dear Ms. Kuntz:

Since January 1996, you and William LaSelle have been in constant communication with me concerning the development of the IWV Marketing Plan. Said Plan has gone through a number of changes, all of which were designed to conform with the current state of the law respecting business opportunity and multilevel marketing programs.

Based on my review of the latest version of your IWV Manual, which accompanied your letter of July 18, 2000, I am of the opinion that your marketing plan, if followed exactly as set forth in your literature, (and video and audio productions) complies with the various statutes, Assurances of Voluntary Compliance, and court opinions relating to business opportunity, multilevel or network marketing programs.

Very truly yours,


William J. Halliday, Jr.
Attorney at Law

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