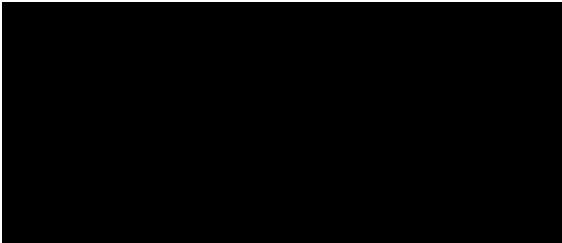


7 February 2023



### Official Information Act #22.102 – Response

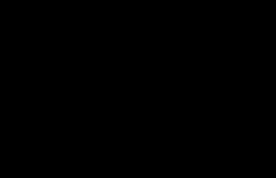
1. We refer to your request for information, received on 18 January 2023, that relates to Shelly Cullen (**Ms Cullen**).
2. We have treated this as a request for information under the Official Information Act 1982 (**OIA**).

### Our response

3. In November 2020, the Commission opened an investigation into the promotion of a scheme in New Zealand known as Lion's Share (**the Scheme**) by Ms Cullen. Specifically, the investigation relates to whether the Scheme is a pyramid selling scheme pursuant to section 24 of the Fair Trading Act 1986, and Ms Cullen's involvement in the Scheme.
4. As part of our investigation, on 21 December 2020 we wrote to Ms Cullen asking her to:
  - 4.1 cease her association with the Scheme and any other pyramid scheme;
  - 4.2 cease promoting and recruiting additional participants into the Scheme or any other pyramid scheme; and
  - 4.3 remove any content from social media (including Facebook and YouTube) that promotes such schemes.
5. A copy of the letter is available on our website [here](#).
6. The investigation into the Scheme is ongoing and we are not in a position to make any further comments about the matter at this stage.

7. The Commission will be publishing this response to your request on its website.
8. Please do not hesitate to contact us at [oiacomcom.govt.nz](mailto:oiacomcom.govt.nz) if you have any questions about this response.

Yours sincerely



OIA and Information Coordinator

Released Under Official Information Act 1982