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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION**

IN THE MATTER OF DETERMINING
Whether there has been a violation
of the Franchise Investment Protection Act of
Washington by:

Apollo Pet Care, Inc.

Respondent.

Order Number S-11-0817-11-CO01

CONSENT ORDER

Pursuant to the Franchise Investment Protection Act of Washington, RCW 19.100, the Securities Division of the Department of Financial Institutions (“Securities Division”) and Respondent, Apollo Pet Care, Inc., do hereby enter into this CONSENT ORDER in settlement of the matters alleged herein. Respondent neither admits nor denies the Findings of Fact and Conclusions of Law stated below.

FINDINGS OF FACT

I. Respondent

1. Respondent Apollo Pet Care, Inc. (“Apollo Pet Care”) is a Nevada corporation in the pet dental care services business and whose principal place of business is in Incline Village, California.

II. Nature of Conduct

2. Apollo Pet Care offers franchises for sale through its website at www.apollopetcare.com. In 2010, Respondent Apollo Pet Care offered and sold a franchise to a couple who were residents of Washington. The Washington residents were offered the franchise opportunity through a series of meetings with company representatives in California and telephone calls and emails directed to the couple in Washington. Apollo Pet Care also provided the Washington residents with a copy of its franchise disclosure document. The franchise opportunity involved the offer of pet dental care services under the

1 Apollo Pet Care trade names and trade marks. Apollo Pet Care provided the couple with training, an
2 operations manual and post-opening assistance. The franchise sold was for the territory of Oregon. In
3 October 2010, the Washington residents paid Apollo Pet Care an initial franchise fee of \$25,000 and agreed
4 to pay an ongoing royalty of 20% of their gross revenue.

5 **III. Registration Status**

6 4. Respondent Apollo Pet Care, Inc. is not currently registered to offer or sell franchises in
7 the state of Washington and has not previously been so registered.

8 Based upon the above Findings of Fact, the following Conclusions of Law are made:

9 **CONCLUSIONS OF LAW**

10 1. The offer and/or sale of the franchise described above constitutes the offer and/or sale of a
11 franchise as defined in RCW 19.100.010(16) and RCW 19.100.010(4).

12 2. The offer and/or sale of said franchise was in violation of RCW 19.100.020 because no
13 registration for such offer and/or sale was effective with the Securities Administrator at the time of the offer
14 or sale.

15 **CONSENT ORDER**

16 Based upon the foregoing and finding it in the public interest:

17 IT IS AGREED AND ORDERED that Respondent Apollo Pet Care, Inc. and its agents and
18 employees each shall cease and desist from offering or selling franchises in violation of RCW
19 19.100.020, the registration section of the Franchise Investment Protection Act.

20 IT IS FURTHER AGREED that Respondent shall reimburse the Securities Division \$1,100,
21 payable prior to the entry of this Consent Order, for its costs of investigation of this matter.

1 IT IS FURTHER AGREED that Respondent Apollo Pet Care, Inc. enters into this Consent Order
2 freely and voluntarily and with a full understanding of its terms and significance.

3 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Order.

4 IT IS FURTHER AGREED that in consideration of the foregoing, Respondent Apollo Pet Care,
5 Inc. waives its rights to a hearing in this matter and judicial review of this order.

6 SIGNED this 7th day of March, 2012

7 Apollo Pet Care, Inc., by

8 /s/

9 Cindy Collins, President


10
11 SIGNED and ENTERED this 22nd day of March, 2012

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14 WILLIAM M. BEATTY
15 Securities Administrator

16 Approved by:

16 Presented by:

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19 SUZANNE SARASON
20 Chief of Enforcement

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19 MARTIN CORDELL
20 Financial Legal Examiner

21 Reviewed by:

22 

23
24 CHARLES CLARK
25 Financial Legal Examiner Supervisor
26 CONSENT ORDER