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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:

AM-PM DOC, LLC,
Ramsey Habeeb Saffouri, and
Lia Langston d.b.a. Westridge Group, LLC
and d.b.a. Westridge Group, Inc.

Respondents.

Order No. S-21-3084-21-SC01

STATEMENT OF CHARGES AND
NOTICE OF INTENT TO
ENTER ORDER TO CEASE AND DESIST

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THE STATE OF WASHINGTON TO:

**AM-PM DOC, LLC, Ramsey Habeeb Saffouri,
and Lia Langston d.b.a. Westridge Group, LLC
and d.b.a. Westridge Group, Inc.**

Please take notice that the Securities Administrator for the state of Washington has reason to believe that Respondents AM-PM DOC, LLC, Ramsey Habeeb Saffouri, and Lia Langston d.b.a. Westridge Group, LLC and d.b.a. Westridge Group, Inc. have violated the Franchise Investment Protection Act of Washington (“the Franchise Act”), RCW 19.100, and that their violations justify the entry of an order of the Securities Administrator under RCW 19.100.248 to cease and desist from such violations. The Securities Administrator finds as follows:

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TENTATIVE FINDINGS OF FACT

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Respondents

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1. AM-PM DOC, LLC (“AMPM”) is a Delaware limited liability company with its primary place of business in Miami-Dade County, Florida. AMPM is in the business of offering licenses to operate in-home medical services to individuals and businesses. AMPM provides emergency medical service to the clients by

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DEPARTMENT OF FINANCIAL INSTITUTIONS
Securities Division
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1 contracting licensed medical practitioners to perform medical services on a house call basis, and provides a
2 license to such practitioners to operate a medical house call business using the system developed by AMPM.

3 2. Ramsey Habeeb Saffouri (“Saffouri”), a Florida resident, is the founder, Chief Executive
4 Officer, and managing member of AMPM.

5 3. Lia Langston, d.b.a. The Westridge Group, LLC and The Westridge Group, Inc. (“Langston”),
6 is a recruiter for AMPM. Saffouri hired Langston to recruit prospective AMPM licensees in exchange for
7 \$5,000 for each licensee recruited.

8 **Nature of Conduct**

9 *Unregistered Franchise Offer*

10 4. In early 2019, while looking at a nurse job posting website, a Washington resident (“ the
11 Resident”) saw an ad for people who were interested in starting their own business. The Resident responded
12 to the ad and was contacted by AMPM by email.

13 5. In April 2019, on behalf of AMPM, Langston sent the Resident an email that explained that
14 their “Concierge Medicine” business opportunity was only for Nurse Practitioners and Physician Assistants
15 and claimed that the Resident’s “income potential for this robust medical business is projected to be
16 between \$1M to 2M per year.”

17 6. AMPM required the Resident to submit a questionnaire. Afterwards, Saffouri invited the
18 Resident to Miami for an interview and conducted the in-person interview in June 2019.

19 7. On or around June 13, 2019, AMPM and the Resident entered into a license agreement (the
20 "License Agreement") pursuant to which AMPM granted to the Resident the exclusive right and license to
21 operate an AMPM “medical house call business” in Washington. In the License Agreement, AMPM granted
22 the Resident the right to use its “Marks and System”; obligated itself to provide the Resident with training,
23 grand opening/marketing program, manuals, marketing consultation and telephone answering services.

1 8. Per the License Agreement, AMPM charged the Resident a \$50,000 license fee, a monthly
2 royalty fee of \$1,212 per month, 40% of the Resident's gross revenue and a \$10,000 fee for grand
3 opening/marketing program assistance.

4 9. When the Resident explained that she did not have the \$50,000 license fee, Saffouri told her
5 that he would help her obtain a loan. Saffouri referred the Resident to a loan broker, who arranged for the
6 loan for which the interest rate was over 20%.

7 10. On or about July 15, 2020, the Resident mailed AMPM a cashier's check for \$50,000 per the
8 company's instruction.

9 11. In September 2019, the Resident attended four days of training at the AMPM offices.
10 Saffouri reviewed the marketing aspects of the business with the Resident and sent her on marketing calls
11 with an AMPM employee. AMPM provided the Resident with training manuals, a "Medical Director
12 Manual" and a "Sales Training Manual."

13 12. AMPM required the Resident to make mandatory and discretionary purchases of business
14 supplies and materials from their approved vendors. The Resident purchased items that contained the
15 AMPM names and logos such as marketing pamphlets, brochures, business cards, uniform, and medical
16 bag.

17 13. Saffouri came to Seattle for the Resident's grand opening and accompanied her on her
18 marketing calls. Saffouri charged the Resident \$10,000 for the grand opening assistance.

19 14. AMPM provided the Resident online marketing on its website. AMPM referred clients to her
20 and tracked her revenue through its billing system called the "AM PM DOC Power Station."

21 *Registration*

22 15. The Respondents AMPM and Saffouri are not currently registered and have not been
23 registered to offer and sell franchises in the State of Washington.

1 16. Respondent Langston is not currently registered and has not been registered as a franchise
2 broker to offer and sell franchises in the State of Washington.

3 *Violations*

4 17. The Respondents AMPM, Saffouri and Langston failed to disclose to the Resident all of the
5 material facts relating to the purchase of the franchise, including, but not limited to financial statements of
6 AMPM.

7 18. Respondent Langston did not provide the Resident with the basis and assumptions regarding
8 the ability to earn “between \$1M to 2M per year.”

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

10 **CONCLUSIONS OF LAW**

11 1. The offer of the franchise described above constitutes the offer and/or sale of a franchise as
12 defined in RCW 19.100.010(6), RCW 19.100.010(12), and RCW 19.100.010(17).

13 2. The offer of a franchise to operate an AM-PM DOC business as described in Paragraphs
14 Four through Fourteen above constitutes the offer and/or sale of an unregistered franchise in violation of
15 RCW 19.100.020.

16 3. The misrepresentation or omission of material facts made regarding the AM-PM DOC
17 franchise opportunity as described in paragraphs Seventeen and Eighteen above is a violation of RCW
18 19.100.170.

19 4. Respondent Langston offered franchises in violation of RCW 19.100.140 because she was
20 not registered as a franchise broker with the state of Washington at the time of the offer and/or sale of a
21 franchise to a Washington resident.

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1 **NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST**

2 Based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities
3 Administrator intends to order that Respondents AMPM, Saffouri, Langston, and their agents and
4 employees, each shall cease and desist from violations of RCW 19.100.020. The Securities Administrator
5 also intends to order that the Respondents AMPM, Saffouri, Langston, and their agents and employees, each
6 shall cease and desist from violations of RCW 19.100.170. The Securities Administrator also intends to
7 order that the Respondent Langston shall cease and desist from violations of RCW 19.100.140.

8 **AUTHORITY AND PROCEDURE**


9 This Order is entered pursuant to the provisions of RCW 19.100.248 and is subject to the provisions
10 of Chapter 34.05 RCW. Each Respondent may make a written request for a hearing as set forth in the
11 NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this
12 order. If a Respondent does not request a hearing within the allowed time, the Securities Administrator
13 intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final and enter an order to
14 permanently cease and desist as to that Respondent.

15 SIGNED and ENTERED this 27th day of September, 2021

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William M. Beatty
Securities Administrator

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Suzanne Sarason
Chief of Enforcement

Martin Cordell
Financial Legal Examiner

Reviewed by:



Holly Mack-Kretzler
Financial Legal Examiner Supervisor