



1           4.       From 2020 to 2022, Smash Franchise and Haskin sold at least four franchises to be located in  
2 Washington and/or to Washington residents for an initial franchise fee ranging from \$124,500 to \$304,500.

3           5.       Smash Franchise provided prospective franchisees and purchasers with a Franchise Disclosure  
4 Document ("FDD") and Franchise Agreement in which it offered to provide the use of its trademarks,  
5 marketing and operational training, and an operations manual.

6           6.       Smash Franchise and Haskin provided an FDD to one of the Residents that contained an Item  
7 19 Financial Performance Representation ("FPR") that stated that the historical results of the Statement of  
8 Income of its affiliate, Smash My Trash, LLC. The FPR, for the period August 2017 to August 2018, showed  
9 gross revenue of \$1,435,495.27 and a net profit of \$730,780.76. Smash Franchise and Haskin claimed that the  
10 numbers were based in part on the fact that the affiliate was operating two trucks in two territories serving a  
11 population of about 500,000. Smash Franchise and Haskin misrepresented and failed to disclose to prospective  
12 purchasers and franchisees that the gross revenue and net profit provided in Item 19 did not accurately reflect  
13 all of the sources of income that were included in those figures. In April 2020, one of the Washington residents  
14 inquired about whether the revenue was based just on income from (1) compacting revenue generated by the  
15 trucks and (2) third party haulers, whereby a franchisee would bill clients for the cost of third parties to haul  
16 away trash. One of Smash Franchise business brokers told the Resident that she had confirmed with  
17 Respondents that there were only two revenue streams. This representation was false as the figures included  
18 numbers from additional revenue streams.

19           7.       In addition, Smash Franchise and Haskin misled the Resident by cherry picking the time frame  
20 of the revenue numbers rather than use its regular accounting period in order to inflate apparent revenues.

21           8.       In 2020, Smash Franchise provided Washington Residents an FDD dated April 30, 2020 that  
22 contained an Item 3 disclosure that stated that it was not involved in any litigation required to be disclosed.  
23

1 Smash Franchise entered into franchise agreements with Washington residents without providing them an  
2 updated FDD disclosure detailing a legal action filed against it by a franchisee.

3 Based upon the above Findings of Fact, the following Conclusions of Law are made:  
4

5 **CONCLUSIONS OF LAW**

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

8 2. Smash Franchise and Haskin violated RCW 19.100.170, the antifraud section of the Franchise  
9 Investment Protection Act, by making untrue statements of material fact or omitting to state material facts  
10 necessary to make the statements made, in light of the circumstances in which they were made, not misleading.

11 Based upon the foregoing and finding it in the public interest:  
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13 **CONSENT ORDER**

14 IT IS AGREED AND ORDERED that Respondents Smash Franchise and Haskin, and their agents  
15 and employees, shall each cease and desist from violating RCW 19.100.170, the antifraud section of the  
16 Franchise Investment Protection Act.

17 IT IS AGREED that Respondents Smash Franchise and Haskin shall be liable for and pay costs in the  
18 amount of \$8,350.

19 IT IS AGREED that Respondents Smash Franchise and Haskin enter into this Consent Order freely  
20 and voluntarily and with a full understanding of its terms and significance.

21 IT IS AGREED that the Securities Division has jurisdiction to enter this order.

22 IT IS AGREED that in consideration of the foregoing, the Respondents waive their right to a hearing  
23 and to judicial review of this matter pursuant to RCW 19.100.260 and Chapter 34.05 RCW.

1 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

2 Signed this 18th day of July, 2024

3 Signed by Smash Franchise Partners, LLC

4 s/ Justin Haskins  
5 Justin Haskin, President

s/ Justin Haskins  
Justin Haskin, individually

6 Approved as to form by:

7 s/ John Verhey  
John Verhey, Attorney for Respondents

8  
9 SIGNED and ENTERED this 30th day of July, 2024.



15 /s/

16 \_\_\_\_\_  
William M. Beatty  
Securities Administrator

17 Approved by:

Presented by:

18 /s/

19 \_\_\_\_\_  
Brian J. Guerard  
Chief of Enforcement

20 \_\_\_\_\_  
Martin Cordell  
Financial Legal Examiner

21 Reviewed by:

22 /s/

23 \_\_\_\_\_  
Huong Lam

1 Financial Legal Examiner Supervisor

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CONSENT ORDER

DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division  
PO Box 41200  
Olympia, WA 98504-1200  
360-902-8760