

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
Washington by:

Order Number S-09-395-10-CO01

CONSENT ORDER

Seniors Helping Seniors, LLC,

Respondent.

INTRODUCTION

Pursuant to the Franchise Investment Protection Act of Washington, RCW 19.100, the Securities Division of the Department of Financial Institutions (the "Securities Division") and the Respondent, Seniors Helping Seniors, LLC 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

1. Seniors Helping Seniors, LLC is a Delaware limited liability company with a principal place of business in Wyomissing Hills, Pennsylvania.

2. Seniors Helping Seniors, LLC businesses offer personal services such as in home elderly care, home assistance, companion care, transportation, homemaking and maintenance and repair to senior citizens.

3. A purchaser of a Seniors Helping Seniors, LLC business is obligated to pay an initial fee, an ongoing royalty fee, and a marketing fee, among others. A purchaser receives an operations manual, marketing materials, and other proprietary information concerning the operation of the business, training in

1 the operation of the business, use of proprietary names and marks, and exclusive rights to operate out of an
2 approved location.

3 4. On May 11, 2009, Seniors Helping Seniors, LLC filed or caused to be filed with the
4 Securities Division an initial application to register the Seniors Helping Seniors, LLC business in
5 Washington (Franchise Registration Application File No. 70014341) pursuant to Washington's Franchise
6 Investment Protection Act. The application to register is currently pending. Information submitted by
7 Seniors Helping Seniors, LLC or its counsel at approximately the same time as the registration filing
8 indicated that the company had offered and sold a business to a Washington couple prior to the date of
9 application. The purchasers of the business were provided a copy of a Franchise Disclosure Document.

10 5. Seniors Helping Seniors, LLC is not currently registered to sell franchises in the state of
11 Washington and has not previously been so registered. There is no notification of claim of exemption on
12 file relating to the Seniors Helping Seniors, LLC business with the state of Washington Securities Division.

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

14
15 **CONCLUSIONS OF LAW**

16 1. The offer and/or sale of the Seniors Helping Seniors, LLC business described above
17 constitutes the offer and/or sale of a franchise as defined in RCW 19.100.010(16) and RCW
18 19.100.010(4).

19 2. The offer and/or sale of said franchise was in violation of RCW 19.100.020, the registration
20 requirement provision of the Franchise Investment Protection Act, because no registration for offers and/or
21 sales was effective with the Securities Division and it appears that Seniors Helping Seniors, LLC does not
22 otherwise qualify for an exemption from registration.

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CONSENT ORDER

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

IT IS AGREED AND ORDERED that Seniors Helping Seniors, LLC and its agents and employees each shall cease and desist the offer and/or sale of unregistered franchises in violation of RCW 19.100.020, the registration section of the Franchise Investment Protection Act of the State of Washington.

IT IS FURTHER AGREED AND ORDERED that Seniors Helping Seniors, LLC and its agents and employees each shall inform the current Washington franchisee of this Consent Order by providing that franchisee a copy of this Consent Order. Seniors Helping Seniors, LLC shall provide to the Securities Division within 60 days of the date of entry of this Consent Order proof of receipt or proof of delivery to that franchisee of a copy of this Consent Order.

IT IS FURTHER AGREED that Seniors Helping Seniors, LLC enters into this Consent Order freely and voluntarily and with a full understanding of its terms and significance.

IT IS FURTHER AGREED that Seniors Helping Seniors, LLC shall reimburse the Securities Division \$600, payable prior to the entry of this Consent Order, for its costs of investigation of this matter.

IT IS FURTHER AGREED that Seniors Helping Seniors, LLC shall, in consideration of the foregoing, waive its right to a hearing in this matter and judicial review of this Consent Order.

1 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent Order.
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5 SIGNED this __1st__ day of __April_____, 2010.

6 Seniors Helping Seniors, LLC by:

7
8 ___/s/ Philip Yocom_____

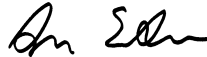
Signature

9 _____

President/CEO

10 Title
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13 SIGNED and ENTERED this 9th day of April, 2010 by:

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16 _____
17 Suzanne Sarason
18 Chief of Enforcement

19 Presented by:

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21 

22 _____
23 Brad Ferber
24 Financial Legal Examiner