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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:)
Wendy's International, LLC;)
Respondent)

Order No. S-17-2358-18-CO01
CONSENT ORDER

Pursuant to the Franchise Investment Protection Act of Washington, RCW 19.100, the Securities Division and Respondent Wendy's International, LLC do hereby enter into this Consent Order in settlement of the matters alleged herein. Respondent neither admits nor denies the Findings of Fact or Conclusions of Law as stated below.

FINDINGS OF FACT

Respondent

1. Wendy's International, LLC ("WIL") is an Ohio limited liability company with its principal place of business in Dublin, Ohio. WIL manages and offers Wendy's restaurant franchises on behalf of its subsidiary Quality Is Our Recipe, LLC. Quality Is Our Recipe, LLC filed a renewal of its claim of exemption from franchise registration, file number 8004951, with the Securities Division in 2016 and has maintained its claim of exemption from June 12, 2015 to present.

Prior Franchise Broker Registration

2. From June 12, 2015 to December 31, 2015, WIL was registered with the Securities Division as a franchise broker to offer franchises in the state under DFI File No. 1000555. WIL's franchise broker application expired on December 31, 2015 and was not renewed.

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Nature of Offering

3. After January 1, 2016, WIL offered franchises on the behalf of its subsidiary, Quality Is Our Recipe, LLC, to at least three persons to operate Wendy's restaurants at various locations in the state.

Registration Status

4. Respondent WIL is not currently registered and has not been registered as a franchise broker to offer and to sell franchises in the state of Washington since December 31, 2015.

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

CONCLUSIONS OF LAW

1. The engagement in the offer of franchises on behalf of Quality Is Our Recipe, LLC as described above qualifies WIL as a franchise broker as defined in RCW 19.100.010(7).

2. Respondent WIL violated RCW 19.100.140, the registration of franchise brokers section of the Franchise Investment Protection Act, because it was not registered with the Securities Division at the time it made offers of franchises in the state after January 1, 2016.

CONSENT ORDER

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

IT IS FURTHER AGREED AND ORDERED that Respondent WIL and its agents and employees, shall each cease and desist from any violation of RCW 19.100.140, the registration of franchise brokers section of the Franchise Investment Protection Act of Washington.

IT IS FURTHER AGREED AND ORDERED that Respondent WIL shall pay investigative costs of \$2,400 prior to the entry of this Consent Order.

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

IT IS FURTHER AGREED that Respondent WIL enters into this Consent Order freely and voluntarily and with a full understanding of its terms and significance.

1 IT IS FURTHER AGREED that in consideration of the foregoing, Respondent WIL waives its right
2 to a hearing and to judicial review of this matter.

3 Signed this 21st day of March, 2018.

4 Signed by:

Approved as to form by:

5 Wendy's International, LLC

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7 By /s/
Kerry Renker Green, Director-Franchise Counsel

 /s/
David W. Oppenheim, Attorney for Respondent

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10 SIGNED and ENTERED this 26th day of March, 2018



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A handwritten signature in black ink, appearing to read "William M. Beatty".

William M. Beatty
Securities Administrator

21 Approved by:

Presented by:

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A handwritten signature in black ink, appearing to read "Suzanne Sarason".

Suzanne Sarason
Chief of Enforcement

/s/

Martin Cordell
Financial Legal Examiner

Reviewed by:

A handwritten signature in black ink, appearing to read "Jack McClellan".

Jack McClellan
Financial Legal Examiner Supervisor