

1
2
3
4
5
6
7
8
9

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

10
11
12
13
14

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

15
16
17
18
19

Zoned In Marketing Group, Inc. d.b.a. Franchise
Sales Force and
Anthony G. Bonnani,

20
21
22
23

Respondents

Order No. S-18-2477-19-CO01

CONSENT ORDER

Pursuant to the Franchise Investment Protection Act of Washington, RCW 19.100, the Securities Division and Respondents Zoned In Marketing Group, Inc. d.b.a. Franchise Sales Force and Anthony G. Bonnani do hereby enter into this Consent Order in settlement of the matters alleged herein. Respondents Zoned In Marketing Group, Inc. and Anthony G. Bonnani neither admit nor deny the Findings of Fact or Conclusions of Law as stated below.

FINDINGS OF FACT

Respondents

1. Zoned In Marketing Group, Inc. d.b.a. Franchise Sales Force (“Franchise Sales Force”) is a Michigan corporation formed on April 27, 2006 with its principal place of business in Mt. Clemens, Michigan. Franchise Sales Force is a recruiting firm that assists franchisors with franchise advertising, marketing and franchisee recruiting.

2. Anthony G. Bonnani (“Bonnani”), a Michigan resident is the President and founder of Franchise Sales Force.

CONSENT ORDER

DEPARTMENT OF FINANCIAL INSTITUTIONS
Securities Division
PO Box 9033
Olympia, WA 98507-9033
360-902-8760

1
2 **Registration Status**

3 3. Respondents Franchise Sales Force and Bonnani applied for and were granted a franchise
4 broker license on June 7, 2010, DFI file number 10005254. Franchise Sales Force allowed its franchise broker
5 license to lapse on December 31, 2011. Respondents Franchise Sales Force and Bonnani are not currently
6 registered as franchise brokers in the state of Washington.

7 **Violation**

8 4. From December 31, 2011 to present, Respondents Franchise Sales Force and Bonnani offered
9 to provide franchisors with franchisee recruiting services through its website at www.franchisesalesforce.com.
10 On its website, Franchise Sales Force states that it handles the entire recruitment role from the initial lead
11 generation all the way to the facilitation of the closing documents for prospective franchisor clients.

12 5. In 2016, Respondents Franchise Sales Force and Bonnani, working through their independent
13 contractor, Vincent P. Blumetti d.b.a. Brainchild Brands, LLC (“Blumetti”), signed a contract with a New
14 York based franchisor and assisted it in the marketing of its pizza franchises (the “franchise”). In or about
15 September, 2016, Blumetti communicated with a Washington resident (“the resident”) via email and
16 telephone regarding the offer of the franchise. Blumetti provided the resident with an application for the
17 franchise, marketing materials and a franchise disclosure document. As a result of the contacts and
18 communications, the resident purchased the franchise in or about December, 2016. The respondents,
19 Franchise Sales Force, Bonnani and its agents, including Vincent P. Blumetti, received and shared a
20 commission of \$12,000 or 40% of the initial franchise fee paid by the resident for the purchase of the franchise.

21 Based upon the above Findings of Fact, the following Conclusions of Law are made:
22
23

1 **CONCLUSIONS OF LAW**

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

4 2. The conduct of Respondents Franchise Sales Force and Bonnani as described in Paragraph 4
5 and 5 of the Findings of Fact above constitutes the engagement, directly or indirectly, as a franchise broker
6 in the business of the offer or sale of franchises as defined in RCW 19.100.010(7).

7 3. Respondents Franchise Sales Force and Bonnani each offered and sold said a franchise in
8 violation of RCW 19.100.140 because each was not registered as a franchise broker with the state of
9 Washington at the time of the offer and/or sale of a franchise to a Washington resident.
10

11 **CONSENT ORDER**

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

13 IT IS AGREED AND ORDERED that Respondents Zoned In Marketing Group, Inc. d.b.a. Franchise
14 Sales Force and Bonnani, and their agents and employees shall each cease and desist from offering or selling
15 franchises in violation of RCW 19.100.140, the franchise broker registration section of the Franchise
16 Investment Protection Act of the state of Washington.

17 IT IS FURTHER AGREED AND ORDERED that Respondents Zoned In Marketing Group, Inc. d.b.a.
18 Franchise Sales Force and Bonnani, shall be liable for and shall pay investigative costs of \$2,000 prior to the
19 entry of this Consent Order.
20

21 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent Order.
22
23

1 IT IS FURTHER AGREED that Respondents Zoned In Marketing Group, Inc. d.b.a. Franchise Sales
2 Force and Bonnani enter into this Consent Order freely and voluntarily and with a full understanding of its
3 terms and significance.

4 IT IS FURTHER AGREED that in consideration of the foregoing, Respondents Zoned In Marketing
5 Group, Inc. d.b.a. Franchise Sales Force and Bonnani waive their right to a hearing and to judicial review of
6 this matter.

7 Signed this 22nd day of January, 2019

8 Signed by:

9 By /s/
10 Anthony G. Bonnani, President, for
11 Zoned In Marketing Group, Inc. d.b.a.
12 Franchise Sales Force Brands

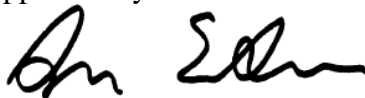
/s/
Anthony G. Bonnani, Individually

13 SIGNED and ENTERED this 29th day of January, 2019

14
15 

16
17 William M. Beatty
18 Securities Administrator

19 Approved by:

20 

21
22 _____
23 Suzanne Sarason
Chief of Enforcement

Presented by:

24
25 _____
26 /s/
27 Martin Cordell
28 Financial Legal Examiner

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Reviewed by:



Jack McClellan
Financial Legal Examiner Supervisor