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

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

SDO - 19 - 02

LEATHER MEDIC, INC.; KYLE LIFE; their agents  
and employees,

SUMMARY ORDER TO CEASE AND DESIST

Respondents.

Case No. 01-10-408

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THE STATE OF WASHINGTON TO:     Kyle Life  
  Leather Medic, Inc.  
  11532 Mahogany Run  
  Fort Myers, FL 33913

**STATEMENT OF CHARGES**

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents, Leather Medic, Inc., Kyle Life, and their agents and employees, have violated the Franchise Investment Protection Act 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 that delay in ordering the Respondents to cease and desist from such violations would be hazardous to investors and to the public and that a Summary Order to Cease and Desist should be entered immediately. The Securities Administrator finds as follows:

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SUMMARY ORDER TO CEASE AND DESIST

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

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**TENTATIVE FINDINGS OF FACT**

**I. Respondents**

1. **LEATHER MEDIC, INC.** (“Leather Medic”) is a Florida corporation with a place of business at 11532 Mahogany Run, Fort Myers, Florida 33913. Leather Medic maintains a website at <http://www.leathermedic.com/>.

2. **KYLE LIFE** (“Life”) was the President of Leather Medic at all times relevant to the matters set forth herein.

**II. Nature of the Offer**

4. Respondents caused to be placed on the Internet at <http://www.leathermedic.com/> (“leathermedic.com”) an advertisement for a Leather Medic franchise opportunity. On October 26, 2001, a Washington resident submitted a request for information regarding the Leather Medic opportunity over the Internet on leathermedic.com.

5. On November 9, 2001, the Washington resident received an information packet in the mail from Leather Medic and Life.

6. The information packet sent by Leather Medic and Life contains materials describing the franchise opportunity. The materials contains representations about the franchise opportunity, including, but not limited to that the cost of the Leather Medic opportunity would be \$25,000 and would include a Leather Medic license, an exclusive territory, equipment, supplies, a marketing package, a training program at Leather Medic headquarters in Florida, and ongoing support and technical assistance. The information packet also contains a letter from Life inviting the Washington resident to call 1-888-561-0423 for more information.

7. In connection with the offer of the franchise opportunity, Respondents failed to provide Washington purchasers with material information regarding the purchase of a Leather Medic franchise, including a Uniform Franchise Offering Circular (UFOC) with financial statements of Leather Medic.

1 8. As of the date this order was entered, Respondents were continuing to advertise their franchise  
2 opportunity at leathermedic.com. The website represents that “Leather Medic franchisees enjoy high profit  
3 margins” and that “the Leather Medic business, marketing and training models have proven results to guarantee  
4 your business’ success!”

5 **III. Registration Status**

6 9. Leather Medic, Inc. and Kyle Life are not currently registered to offer or sell franchises in the state  
7 of Washington and have not previously been so registered.

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

9 **CONCLUSIONS OF LAW**

10 **I. Franchise**

11 1. The offer and/or sale of the franchise opportunity described in paragraphs 4, 5, 6, 7 and 8 of the  
12 Tentative Findings of Fact above constitutes the offer and/or sale of a franchise as defined in RCW 19.100.010(4).

13 **II. Violation of RCW 19.100.020**

14 2. The offer and/or sale of the franchise is in violation of RCW 19.100.020 because no registration for  
15 such offer and/or sale is on file with the Securities Administrator of the State of Washington.

16 **III. Violation of RCW 19.100.170**

17 3. The offer and/or sale of the franchise is in violation of RCW 19.100.170 because as set forth in  
18 paragraph 7 of the Tentative Findings of Fact, Respondents failed to provide the Washington resident with a  
19 Uniform Franchise Offering Circular (UFOC) disclosure document containing complete material information  
20 regarding the franchise opportunity.  
21

**EMERGENCY**

The Securities Administrator finds that an emergency exists, that the continued violations of RCW 19.100.020 and RCW 19.100.170 constitute a threat to the investing public, and that a summary order to cease and desist from those violations is in the public interest and necessary for the protection of the investing public.

**SUMMARY ORDER**

Based on the foregoing, NOW, THEREFORE, IT IS HEREBY SUMMARILY ORDERED that Respondents Leather Medic, Inc., Kyle Life, and their agents and employees, cease and desist from offering and/or selling franchises in any manner in violation of RCW 19.100.020, the section of the Franchise Investment Protection Act requiring registration.

It is further SUMMARILY ORDERED that Respondents Leather Medic, Inc., Kyle Life, and their agents and employees, cease and desist from violation of RCW 19.100.170, the anti-fraud section of the Franchise Investment Protection Act.

DATED this 20th day of February , 2002.



DEBORAH R. BORTNER  
Securities Administrator

Approved by:

Presented by:

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Michael E. Stevenson  
Chief of Enforcement

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Chad Standifer  
Staff Attorney

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APPLICATION FOR ADJUDICATIVE HEARING

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Poochie's

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**Securities Division**  
**PO Box 9033**  
**Olympia, WA 98507-9033**  
**360-902-8760**