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Commissioner of Financial Protection and Innovation  
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Deputy Commissioner  
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5 Department of Financial Protection and Innovation  
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8 Attorneys for Complainant

9 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION  
10 OF THE STATE OF CALIFORNIA

11 In the Matter of: )  
12 THE COMMISSIONER OF FINANCIAL )  
13 PROTECTION AND INNOVATION, ) CONSENT ORDER  
14 Complainant, )  
15 v. )  
16 PACKAGE HUB BUSINESS CENTERS, )  
17 doing business as PBC, LLC., )  
18 Respondent. )

19 This Consent Order is entered into between the Commissioner of Financial Protection and  
20 Innovation (Commissioner) and Package Hub Business Centers, doing business as PBC, LLC.  
21 (PBC) (collectively the Parties) and is made with respect to the following facts:

22 **I.**

23 **Recitals**

24 A. The Commissioner is the head of the Department of Financial Protection and  
25 Innovation (Department) and is responsible for administering and enforcing the Franchise  
26 Investment Law (FIL) (Corp. Code, § 31000 et seq.),<sup>1</sup> and registering the offer and sale of franchises  
27

28  
<sup>1</sup> All further statutory references are to the Corporations Code unless otherwise indicated.

1 in California. To register a franchise, a franchisor must file an application which includes a Uniform  
2 Franchise Disclosure Document (FDD) with the Department for review and approval, in accordance  
3 with sections 31111 and 31114. The FIL requires franchisors to disclose certain material  
4 information which is intended to provide prospective franchisees with facts upon which to make an  
5 informed decision to purchase a franchise, as stated in section 31001.

6 B. At all relevant times, Package Hub Business Centers, doing business as PBC, LLC.  
7 (PBC), a Delaware limited liability company doing business at 1201 Richardson Dr. Ste. 200  
8 Richardson, Texas 75080. At all relevant times, PBC offers collective purchasing, advertising and  
9 marketing program franchises to California investors.

10 C. Pursuant to section 31110, it is unlawful for any person to offer or sell a franchise in  
11 this state unless the offer has been registered with the Commissioner or is exempted.

12 1. From April 21, 2023, to present, PBC was not registered or exempt from FIL  
13 registration with the Department<sup>2</sup>. From at least 2023 to 2024, PBC entered into at least ninety-five  
14 (95) franchise agreements named as “Member Agreements” or “Transfer Member Agreements” for  
15 the operation of PBC outlets, using a system prescribed by PBC. PBC was not registered or exempt  
16 from registration to offer and sell franchises by the Commissioner pursuant to the FIL from 2022 to  
17 2024. Therefore, PBC violated section 31110 of the FIL.

18 D. The Commissioner hereby finds as follows:

19 1. PBC offered and sold at least ninety-five (95) PBC franchises without being  
20 registered with the Commissioner or exempt, in violation of section 31110.

21 E. NOW, THEREFORE, in consideration of the foregoing, and the terms and conditions  
22 set forth herein, the Parties agree as follows:

## 23 II.

### 24 Terms and Conditions

25 1. Purpose. This Consent Order resolves the issues set forth above before the  
26 Commissioner in a manner that avoids the expense of a hearing and other possible court  
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28 \_\_\_\_\_  
<sup>2</sup> PBC was registered with the Department from April 30, 2020, to April 20, 2021 (App-16981); October 8, 2021 to April 20, 2022 (App-22325); and July 19, 2022, to April 20, 2023 (App-24491).

proceedings, protects consumers, is in the public interest, and is consistent with the purposes and provisions of the applicable law.

2. Desist and Refrain Order. Pursuant to Corporations Code section 31406, Package Hub Business Centers, doing business as PBC, LLC. will consent to an order to desist and refrain from violating Corporations Code sections 31110, and any other provision of the FIL. The issuance of this order is necessary, in the public interest, for the protection of investors and is consistent with the purposes, policies, and provisions of the FIL.

3. Penalties. Package Hub Business Centers, doing business as PBC, LLC. will consent to pay to the Department administrative penalties in the amount of thirty six thousand dollars (\$36,000) for at least ninety-five (95) FIL violations at \$378 per violation (Penalties), in four (4) installment payments as follows: (1) Nine thousand dollars (\$9,000) due to the Department no later than September 30, 2025; (2) Nine thousand dollars (\$9,000) due to the Department no later than December 30, 2025; (3) Nine thousand dollars (\$9,000) due to the Department no later than March 30, 2026; and (4) Nine thousand dollars (\$9,000) due to the Department no later than June 30, 2026. Failure to pay each and every installment of the Penalties in a timely manner shall be deemed to be a material breach of this Consent Order.

4. Waiver of Hearing Rights. PBC acknowledges that the Commissioner is ready, willing, and able to proceed with the filing of an administrative enforcement action on the charges contained in this Consent Order. PBC hereby waives the right to any hearings, and to any reconsideration, appeal, or other right to review which may be afforded pursuant to the FIL, the Administrative Procedure Act (APA), the Code of Civil Procedure (CCP), or any other provision of law. PBC further expressly waives any requirement for the filing of any accusation pursuant to Government Code section 11415.60, subdivision (b). By waving such rights, PBC effectively consents to this Consent Order and all of its terms becoming final.

5. Failure to Comply with Consent Order. PBC agrees that if it fails to comply with the Desist and Refrain Order and/or the Penalties provision set forth in paragraph 3 in this Consent Order, the Commissioner may, in addition to all other available remedies it may invoke under the FIL, summarily suspend, revoke, or deny its FIL registration (if applicable). PBC stipulates to the

1 finality of any such FIL registration suspensions, revocations, or denials that the Commissioner may  
2 order. PBC waives any notice and hearing rights to contest such summary suspensions,  
3 revocations, or denials which may be afforded under the FIL, the APA, the CCP, or any other  
4 provision of law in connection therewith.

5 6. Information Willfully Withheld or Misrepresented. This Consent Order may be  
6 revoked, and the Commissioner may pursue any and all remedies available under law against PBC,  
7 if the Commissioner discovers that PBC knowingly or willfully withheld or misrepresented  
8 information used for and relied upon in this Consent Order.

9 7. Future Actions by Commissioner. If PBC fails to comply with any terms of the  
10 Consent Order, the Commissioner may institute proceedings for any and all violations otherwise  
11 resolved by this Consent Order. The Commissioner reserves the right to bring any future actions  
12 against PBC, or any of its partners, owners, officers, shareholders, directors, or employees, or  
13 successors for any and all unknown violations of the FIL or any other law under the Commissioner's  
14 jurisdiction.

15 8. Assisting Other Agencies. Nothing in this Consent Order limits the Commissioner's  
16 ability to assist any other government agency (whether city, county, state, or federal) with any  
17 administrative, civil, or criminal action brought by that agency against PBC, or any other person  
18 based upon any of the activities alleged in this matter or otherwise.

19 9. Headings. The headings to the paragraphs of this Consent Order are inserted for  
20 convenience only and will not be deemed a part hereof or affect the construction or interpretation of  
21 the provisions hereof.

22 10. Binding. This Consent Order is binding on all heirs, assigns, and/or successors in  
23 interest.

24 11. Reliance. Each of the Parties represents, warrants, and agrees that in executing this  
25 Consent Order, it has relied solely on the statements set forth herein and the advice of its own  
26 counsel. Each of the Parties further represents, warrants, and agrees that in executing this Consent  
27 Order, it has placed no reliance on any statement, representation, or promise of any other party, or  
28 any other person or entity not expressly set forth herein, or upon the failure of any party or any

1 other person or entity to make any statement, representation, or disclosure of anything whatsoever.  
2 The Parties have included this clause: (1) to preclude any claim that any party was in any way  
3 fraudulently induced to execute this Consent Order; and (2) to preclude the introduction of parol  
4 evidence to vary, interpret, supplement, or contradict the terms of this Consent Order.

5 12. Waiver, Amendments, and Modifications. No waiver, amendment, or modification  
6 of this Consent Order will be valid or binding unless it is in writing and signed by each of the  
7 Parties. The waiver of any provision of this Consent Order will not be deemed a waiver of any  
8 other provision. No waiver by either Party of any breach of, or of compliance with, any condition  
9 or provision of this Consent Order by the other Party will be considered a waiver of any other  
10 condition or provision or of the same condition or provision at another time.

11 13. Full Integration. This Consent Order is the final written expression and the complete  
12 and exclusive statement of all the agreements, conditions, promises, representations, and covenant  
13 between the Parties with respect to the subject matter hereof, and supersedes all prior or  
14 contemporaneous agreements, negotiations, representations, understandings, and discussions  
15 between and among the Parties, their respective representatives, and any other person or entity with  
16 respect to the subject matter covered hereby.

17 14. Governing Law. This Consent Order will be governed by and construed in  
18 accordance with California law. Each of the Parties hereto consents to the jurisdiction of such  
19 court, and hereby irrevocably waives, to the fullest extent permitted by law, the defense of an  
20 inconvenient forum to the maintenance of such action or proceeding in such court.

21 15. Counterparts. This Consent Order may be executed in one or more separate  
22 counterparts, each of which when so executed, shall be deemed an original. Such counterparts shall  
23 together constitute a single document.

24 16. Effect Upon Future Proceedings. If PBC applies for any license, registration, permit,  
25 or qualification under the Commissioner's current or future jurisdiction, or is the subject of any  
26 future action by the Commissioner to enforce this Consent Order, then the subject matter hereof  
27 shall be admitted for the purpose of such application(s) or enforcement proceeding(s).  
28

17. Voluntary Agreement. PBC enters into this Consent Order voluntarily and without coercion and acknowledges that no promises, threats, or assurances have been made by the Commissioner or any officer, or agent thereof, about this Consent Order. The Parties each represent and acknowledge that he, she, or it is executing this Consent Order completely voluntarily and without any duress or undue influence of any kind from any source.

18. Notice. Any notice required under this Consent Order shall be provided to each party at the following addresses:

To PBC Franchising: Cheryl L. Mullin, Esq.  
Mullin, PC.  
99 Lantern Drive, Suite 101  
Doylestown, PA 18901  
cheryl.mullin@mullinlawpc.com

To the Commissioner: Marisa I. Urteaga-Watkins, Esq.,  
Department of Financial Protection and Innovation  
651 Bannon Street, Suite 300  
Sacramento, California 95811  
marisa.urteaga-watkins@dfpi.ca.gov

19. Signatures. A fax, scanned, or electronic signature shall be deemed the same as an original signature.

20. Public Record. PBC hereby acknowledges that this Consent Order is and will be a matter of public record.

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21. Effective Date. This Consent Order shall become final and effective when signed by all Parties and delivered by the Commissioner’s agent via e-mail to PBC’s agent, Ms. Cheryl L. Mullin, Esq. at cheryl.mullin@mullinlawpc.com.

22. Authority to Sign. Each signatory hereto covenants that he/she possesses all necessary capacity and authority to sign and enter into this Consent Order and undertake the obligations set forth herein.

Dated: 9/29/2025

KHALIL MOHSENI  
Commissioner of Financial Protection  
and Innovation

By: \_\_\_\_\_  
COLLEEN MONAHAN  
Deputy Commissioner

Dated: 9/25/2025

PACKAGE HUB BUSINESS CENTERS, doing  
business as PBC, LLC.

By: \_\_\_\_\_  
BRANDON GALE  
President