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2 **STATE OF CALIFORNIA**
3 **BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY**
4 **DEPARTMENT OF BUSINESS OVERSIGHT**

5 TO: Jamie Mamikunian
6 Buggy Bubbles, LLC dba Stroller Spa
7 Stroller Spa Franchising LLC
8 127 Starview Way
9 San Francisco, CA 94131
10 and
11 3566 Sacramento Street
12 San Francisco, CA 94118

13 **DESIST AND REFRAIN ORDER**
14 **(For violations of section 31110 of the Corporations Code)**

15 The Commissioner of Business Oversight finds that:

16 1. At all relevant times hereto, Buggy Bubbles, LLC dba Stroller Spa (“Stroller Spa”) is and
17 was a California limited liability company formed in August 2011 and located at 127 Starview Way,
18 San Francisco, CA 94131. At all relevant times hereto, Stroller Spa Franchising LLC (“Spa
19 Franchising”) is and was a California limited liability company formed in August 2013 and located at
20 3566 Sacramento Street, San Francisco, California 94118.

21 2. Ms. Jamie Mamikunian (“Mamikunian”) was at all relevant times the owner and founder
22 of Stroller Spa and Spa Franchising.

23 3. Since August of 2011, Stroller Spa, Spa Franchising and Mamikunian have established a
24 program within the State of California whereby individuals are exclusively authorized to operate a
25 Stroller Spa program in their respective communities. The purpose of the program is to provide
26 services and training under the umbrella of Stroller Spa trademarks, and to assist interested parties in
27 participating in the stroller and car seat detail and repair industry. To further this program, a
28 “Collaboration Agreement” was executed with each prospect and the entity Buggy Bubbles, LLC.
Eventually these services also included the sales and rentals of strollers, car seats and other

1 accessories for babies and young children. Stroller Spa noted in its “Collaboration Agreement” with
2 prospective operators that the business was materially dependent for its success on “proprietary
3 information, proprietary software, trade secrets, trademarks, logos, service marks, inventions,
4 processes, formulas, compounds, procedures, methods, systems, budgets, strategies, data, research,
5 business information and know how” that is the proprietary information of Stroller Spa, and this
6 proprietary information would be shared with each prospective operator. Further, each prospective
7 operator agreed to pay a fee of \$499.

8 The company, on the internet, is presented as an “ideal opportunity” to “carve your own niche
9 into one of the fastest growing industries.” Each prospective operator is assured of the right to
10 operate in a designated territory.

11 4. As of this date, there are approximately 6 locations registered in the Stroller Spa program
12 throughout the State of California.

13 5. The Commissioner has determined that the relationship between Buggy Bubbles, LLC dba
14 Stroller Spa, Stroller Spa Franchising LLC and each Recipient (as operators of the program are
15 known), is a franchise, as defined in California Corporations Code section 31005. These franchises
16 were offered and sold in this state.

17 6. The Department of Business Oversight has not issued a franchise registration to Stroller
18 Spa Franchising LLC, Buggy Bubbles, LLC dba Stroller Spa or Mamikunian for the offer or sale of
19 Stroller Spa/Buggy Bubbles franchises in this state.

20 Based on the foregoing findings, the Commissioner of Business Oversight is of the opinion
21 that Buggy Bubbles, LLC dba Stroller Spa, Stroller Spa Franchising LLC and Jamie Mamikunian
22 have offered or offered and sold franchises in California that are subject to registration under the
23 California Franchise Investment Law, in violation of California Corporations Code section 31110.

24 Pursuant to section 31406 of the California Corporations Code, Buggy Bubbles, LLC dba
25 Stroller Spa, Stroller Spa Franchising LLC and Jamie Mamikunian are hereby ordered to desist and
26 refrain from the further offer or sale of Stroller Spa/Buggy Bubbles franchises unless and until the
27 offers have been duly registered under the California Franchise Investment Law or unless exempt.

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This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: January 21, 2014
San Francisco, California

JAN LYNN OWEN
Commissioner of Business Oversight

By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division