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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: Hound Mounds, Inc. doing business as POOP 911
Geoffrey Lawrence Bodle
3824 Cedar Springs Road, Suite 200
Dallas, Texas 75219

DESIST AND REFRAIN ORDER
(For violations of section 31110 of the California Corporations Code)

The California Corporations Commissioner finds that:

1. At all relevant times, Hound Mounds, Inc. doing business as POOP 911 (hereafter “Hound Mounds”) is or was a Texas corporation formed in November 2005. Hound Mound’s principal place of business is located at 3824 Cedar Springs Road, Suite 200, Dallas, Texas 75219. Hound Mounds maintains a website at www.poop911.com.
2. At all relevant times, Geoffrey Lawrence Bodle (“Bodle”) was the founder, chief executive officer and a control person of Hound Mounds.
3. At all relevant times, the Hound Mounds website solicited persons interested in starting a POOP 911 franchise by promising a “low cost of entry” and “return of your initial investment” usually within the first year of business as a pet waste disposal service. The website states: “If you are in a heavily populated city where you think POOP 911 pooper scooper service would be a great addition to your community services give us a call or drop us a line.” The website does not contain any language stating that the franchise opportunity is not available to residents of California and presently lists 37 franchise locations, including seven in California.

1 4. Since as early as July 2009, Hound Mounds and Bodle have offered and/or sold franchises
2 to California residents pursuant to “franchise agreements.” Franchisees are required to attend training
3 in Dallas, purchase a POOP 911 vehicle wrap, and agree to pay monthly “royalty fees” ranging from
4 13.9% to 18.9% in exchange for the grant of an exclusive territory and rights to use Hound Mounds
5 trademark names and logos. Franchisees are also provided an operating manual with detailed sales
6 and marketing plans, uniforms and supplies, and daily call center support for customer scheduling and
7 billing. Additionally, franchisees are required to refer all business inquiries to Hound Mounds and are
8 contractually prohibited from diverting business to competitors.
9

10 5. The “franchise agreements” offered and sold by Hound Mounds constitute franchises
11 within the meaning of California Corporations Code section 31005.
12

13 6. The offer and sale of Hound Mounds franchises in California has not been registered under
14 the Franchise Investment Law and are not exempted under Chapter 1, beginning with California
15 Corporations Code section 31100, of that law.
16

17 7. California Corporations Code section 31402 provides in relevant part:

18 If, in the opinion of the commissioner, the offer of any franchise is subject
19 to registration under this law and it is being, or it has been, offered for sale
20 without the offer first being registered, the commissioner may order the
21 franchisor or offeror of that franchise to desist and refrain from the further
22 offer or sale of that franchise unless and until the offer has been duly
23 registered under this law. If, after the order has been made, a request for a
24 hearing is filed in writing within 60 days from the date of service of the
25 order by the person on to whom the order was directed, a hearing shall be
26 held in accordance with Chapter 5 (commencing with Section 11500) of
27 Part 1 of Division 3 of Title 2 of the Government Code

28

 If that person fails to file a written request for hearing within 60 days of
the date of service of the order, the order shall be deemed a final order of
the commissioner and shall not be subject to review by any court or
agency, notwithstanding Section 31501.

1 Based on the foregoing findings, the California Corporations Commissioner is of the opinion
2 that Hound Mounds, Inc. doing business as POOP 911 and Geoffrey Lawrence Bodle have engaged in
3 the offer and sale of franchises in this state that is subject to registration under the Franchise
4 Investment Law without the offers first being registered, in violation of California Corporations Code
5 section 31110. Pursuant to California Corporations Code section 31402, Hound Mounds, Inc. doing
6 business as POOP 911 and Geoffrey Lawrence Bodle are hereby ordered to desist and refrain from the
7 further offer or sale of franchises, including but not limited to POOP 911, unless and until the offers
8 have been duly registered under the Franchise Investment Law or unless exempt.
9

10 This Order is necessary, in the public interest, for the protection of investors and consistent
11 with the purposes, policies and provisions of the Franchise Investment Law.
12

13
14 Dated: June 25, 2012

JAN LYNN OWEN
California Corporations Commissioner

15
16 By _____
17 Alan S. Weinger
18 Deputy Commissioner
19 Enforcement Division
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1 ALAN S. WEINGER
Deputy Commissioner
2 MIRANDA LEKANDER (CA BAR NO. 210082)
Senior Corporations Counsel
3 DEPARTMENT OF CORPORATIONS
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4 Sacramento, California 95814
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5

6 Attorneys for Complainant

7 BEFORE THE DEPARTMENT OF CORPORATIONS
8 OF THE STATE OF CALIFORNIA

10	In the Matter of)	
11	THE CALIFORNIA CORPORATIONS)	STIPULATION TO ENTRY OF DESIST AND
12	COMMISSIONER,)	REFRAIN ORDER
13	Complainant,)	CORPORATIONS CODE SECTION 31402
14	v.)	
15	HOUND MOUNDS, INC. doing business as)	
16	POOP 911 and GEOFFREY LAWRENCE)	
17	BODLE, as an individual,)	
18	Respondents.)	

19
20 In resolution of an inquiry into the offer and sale of unregistered franchises within the State
21 of California, and without admitting or denying such activities, IT IS HEREBY STIPULATED
22 AND AGREED between Hound Mounds, Inc. doing business as POOP 911 and Geoffrey Lawrence
23 Bodle (hereafter collectively "Respondents") and the California Corporations Commissioner
24 ("Commissioner"), as follows:

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HOUND MOUNDS, INC. doing business as POOP 911

Dated: 6/28/2012

By _____
Geoffrey Lawrence Bodle, Individually and on behalf
of Hound Mounds, Inc. doing business as POOP 911

Approved as to Form and Content

Dated: 6/28/2012

By _____

Kat Tidd, Esq,
Attorney on behalf of Hound Mounds, Inc. doing business as POOP 911 and Geoffrey Lawrence
Bodle