

ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF MARYLAND

IN THE MATTER OF:

Federal Injury Centers, LLC
dba Federal Injury Centers

Respondent.

Case No. 2025-0039

* * * * *

CONSENT ORDER

WHEREAS, the Securities Division of the Office of the Attorney General of Maryland (the “Securities Division”) initiated an investigation into the franchise-related activities of Federal Injury Centers, LLC., dba Federal Injury Centers (“FIC”) under the authority granted under the Maryland Franchise Registration and Disclosure Law, MD. CODE ANN. BUS. REG. §§14-201 et seq. (2024 Repl. Vol.) (the “Maryland Franchise Law”); and

WHEREAS, based on information presented by the Securities Division, the Maryland Securities Commissioner (the “Securities Commissioner”) has concluded that grounds exist to allege that FIC violated the registration and disclosure provisions of the Maryland Franchise Law in relation to offers and sales of a franchise under the Maryland Franchise Law; and

WHEREAS, before the holding of a hearing in this matter, without trial or final adjudication of any issue of fact or law, and without FIC admitting or denying any violation of law, the Securities Commissioner and FIC have reached an agreement to enter into this Consent Order; and

WHEREAS, FIC waives its right to a hearing and any rights to seek judicial review or

otherwise challenge or contest the terms and conditions of this Consent Order; and

WHEREAS, the Securities Commissioner has determined that it is in the public interest to issue this Consent Order;

NOW, THEREFORE, it is hereby agreed, and the Securities Commissioner hereby orders:

I. JURISDICTION

1. The Securities Commissioner has jurisdiction in this proceeding pursuant to Section 14-210 (a) of the Maryland Franchise Law.

II. FINDINGS OF FACT

2. FIC is a Florida limited liability company with a principal business address located at 3876 Edgar Avenue, Odessa, Florida 33556.

3. FIC offers and sells franchises that either (1) provide training and education to healthcare practitioners so that they become experienced in handling U.S. Department of Labor/The Office of Workers' Compensation Programs injury claims from a medical office or facility under the Federal Injury Centers name and marks; or (2) offer and sells management, marketing, and facility based services to medical practices and licensed professionals offering and providing training and education to healthcare practitioners so that they become experienced in handling U.S. Department of Labor/The Office of Workers' Compensation Programs injury claims.

4. FIC has never been registered with the Securities Division to offer and sell franchises under the Maryland Franchise Law.

5. On June 28, 2021, FIC filed an initial application with the Securities Division to

register the FIC franchise offering under the Maryland Franchise Law.

6. On July 14, 2021, the Securities Division reviewed FIC's initial application and issued comments to the application that the franchisor needed to address before the Securities Division would register FIC's franchise offering. Among the comments the Securities Division made on FIC's June 28, 2021 submission was a request that the franchisor submit an undertaking stating that the franchisor had not offered or sold any franchises in Maryland during the time the franchisor was not effectively registered under the Maryland Franchise Law.

7. On March 16, 2022, FIC submitted the undertaking that FIC has neither offered or sold any franchises in Maryland or to any Maryland residents during the time it was not registered under the Maryland Franchise Law. The notary seal on the undertaking indicates that the Vice President of FIC signed the undertaking on November 24, 2021.

8. On April 04, 2022, the Securities Division issued additional comments on FIC's June 28, 2021 submission. FIC did not respond to the Securities Division's April 04, 2022 comment letter.

9. On October 06, 2022, the application filed by FIC on June 28, 2021 was deemed abandoned by the Securities Division.

10. On August 31, 2023, FIC filed a new initial franchise registration application with the Securities Division ("August 31, 2023 application").

11. On September 29, 2023, the Securities Division reviewed FIC's August 31, 2023 application and issued comments to the financial statements submitted with the application. Among the comments the Securities Division made was that the financial information submitted with the application was not current within 120 days of the filing of the application, and that the franchisor needed to provide current financial statements before the Securities Division would

continue its review of FIC's application.

12. On November 29, 2023, FIC resubmitted its August 31, 2023 application and included current financial statements.

13. On December 13, 2023, the Securities Division issued additional comments on FIC's August 31, 2023 application.

14. On June 06, 2024, FIC responded to the Securities Division's December 13, 2023 comment letter.

15. On July 18, 2024, the Securities Division issued additional comments on FIC's August 31, 2023 submission ("July 18, 2024 comment letter"). Among the comments the Securities Division made in the July 18, 2024 comment letter was a request that the franchisor submit an undertaking stating that the franchisor had not offered or sold any franchises in Maryland during the time the franchisor was not effectively registered under the Maryland Franchise Law. The Securities Division also requested an explanation for a Maryland franchise outlet listed in item 20 (table 3) of the FDD submitted for review because the franchisor has never registered to offer or sell franchises in Maryland.

16. On November 19, 2024, FIC responded to the July 18, 2024 comment letter and submitted documents for Maryland outlets listed in item 20 (table 3). Among the documents FIC submitted are three Management Services Agreement ("Management Agreements") for three Maryland clinic practices ("Maryland Locations").

17. In January 2025, the Securities Division reviewed the Management Agreements. The details of each Management Agreement with the Maryland Locations are described below:

- A. On May 28, 2021, FIC entered into a Management Agreement with
Vandeman Vision Health, LLC, a Maryland limited liability company for a

clinic located in Silver Spring, Maryland.

B. On August 5, 2021, FIC entered into a Management Agreement with Rosavan Pine Heights, LLC, a Maryland limited liability company for a clinic located in Baltimore, Maryland.

C. On August 5, 2021, FIC entered into a Management Agreement with Rosavan Temple Hills, LLC, a Maryland limited liability company for a clinic located in Temple Hills, Maryland.

18. The Management Agreements with the Maryland Locations are for an initial term of one year, which can be automatically renewed, but the Management Agreements may be terminated earlier upon written agreement by the parties.

19. Pursuant to the May 28, 2021 Management Agreement referenced in paragraph 17(A) above, FIC collected an initial fee in the amount of \$45,000. Pursuant to the August 5, 2021 Management Agreement referenced in paragraph 17(C) above, FIC collected an initial fee of \$10,000. Other than the foregoing, the Maryland Locations paid no initial fees or franchise fees, but the Maryland Locations did agree to pay to FIC a percentage of the gross collections of management fees and billing fees the Maryland Locations earned from their FIC clinics.

20. The Securities Division staff viewed FIC's website, and the website identified a total of seven (7) FIC Maryland Locations. All the Maryland Locations listed on FIC's website use the FIC name and trademarks.

21. FIC represents that there are seven (7) FIC Maryland Locations, but there are only three written agreements. All seven Maryland Locations use the FIC name and trademarks

22. FIC has represented that all Maryland Locations listed on the website are owned through businesses principally owned by "TV," a Maryland resident, and that the seven

Maryland Locations operate under the same terms as the three Management Agreements that FIC provided to the Securities Division.

23. FIC has represented that it is willing to cooperate with the Securities Division to remedy any alleged violations of Maryland Law.

24. The Securities Division has determined that each Management Agreement for the Maryland Locations constitute a “franchise” under the Maryland Franchise Law.

25. All the Maryland Locations are open as of the date of this Consent Order.

26. FIC did not give a copy of a franchise disclosure document required under the Maryland Franchise Law prior to the offers and the sale of franchises for the Maryland Locations.

27. FIC represents that, other than the seven Management Agreements for the Maryland Locations, FIC did not offer or sell a franchise in Maryland or to any Maryland residents.

28. FIC represents and agrees that, in the future, it will comply with all provisions under the Maryland Franchise Law.

III. CONCLUSIONS OF LAW

29. By engaging in the above activities, the Securities Commissioner has concluded that FIC violated sections 14-214, 14-216, and 14-231 of the Maryland Franchise Law.

IV. ORDER AND CONSENT

30. THE SECURITIES COMMISSIONER HEREBY ORDERS AND FIC HEREBY CONSENTS AND REPRESENTS AS FOLLOWS:

- A. FIC shall immediately and permanently cease and desist from the offer and sale of franchises in violation of the Maryland Franchise Law;
- B. Within ten (10) days of its receipt of a fully executed Consent Order of the Securities Commissioner, FIC shall send by Federal Express to the Maryland

Locations the following: (i) a copy of this Consent Order; and (ii) a letter, in substantially the form attached to this letter as Exhibit 1, captioned “Notice of Rescission Rights,” notifying the Maryland Locations that they are being offered an opportunity to immediately rescind their FIC Agreements under the terms of this Consent Order and, if they opt to rescind, receive a refund of any initial fees they paid FIC;

- C. The Securities Commissioner had determined that FIC’s offer of a franchise to the Maryland Locations in the form of the Notice of Rescission Rights described in this Consent Order is exempt from the registration provisions of the Maryland Franchise Law;
- D. FIC shall remit to the Office of Attorney General, as a civil monetary penalty, the sum of Ten Thousand Dollars (\$10,000.00); and
- E. FIC acknowledges that this Consent Order is a disclosable order as described under the Maryland Franchise Law and Item 3 of the NASAA Franchise Registration and Disclosure Guidelines and Amended FTC Franchise Rule.

V. JURISDICTION RETAINED

31. Jurisdiction shall be retained by the Securities Commissioner for such further orders and directions as may be necessary or appropriate for the construction or enforcement of the Consent Order.

VI. CONSEQUENCES OF VIOLATING THIS CONSENT ORDER

32. If FIC fails to comply with any term of this Consent Order, the Securities Division may bring administrative or judicial proceedings against them to enforce this Consent Order or to sanction them for violating an order of the Securities Commissioner and may take any other action authorized under the Maryland Franchise Law or any other applicable law. In any such proceeding in which, after an opportunity for a hearing, the Securities Commissioner or a court finds that FIC violated this Consent Order, the Statement of Facts and the violations of the Maryland Franchise Law alleged in the Consent Order shall be deemed admitted and may be

introduced into evidence against it.

VII. MODIFICATION OF CONSENT ORDER

33. The terms of this Consent Order may be modified only by a subsequent order issued by the Securities Commissioner.

DATE OF THIS ORDER;

July 16, 2025

SO ORDERED:

**Commissioner's Signature on File
w/Original Documents**

MELANIE SENTER LUBIN
SECURITIES COMMISSIONER

BY CONSENT:

Federal Injury Centers, LLC

By: Christopher Helms, President

FORM
(On Company Letterhead)

BY FEDERAL EXPRESS

Re: **[Company] Notice of Rescission Rights**

Dear _____:

In accordance with discussions our attorneys have had with the Securities Division of the Office of the Attorney General of Maryland, [Insert Name of Company] ("we") have agreed under the attached Consent Order to offer rescission to any Maryland residents who entered into Management Service Agreements with us in violation of the registration and disclosure provisions of the Maryland Franchise Law. The Securities Division has concluded that the Management Services Agreement you signed is a "franchise" under Maryland law. We are making this offer in settlement of the administrative proceeding that the Division may bring for the alleged sale of a franchise in violation of the Maryland Franchise Law, and this offer does not affect any civil liability for which we may be responsible.

If you elect to rescind your Management Services Agreement, we agree to terminate that Agreement, including all post-term and non-competition obligations you may have to us under that Agreement. You also will give up any rights to use our trademarks and system and be obligated to refrain from using and disclosing any of our trade secrets and any of our confidential and proprietary information

In the event you rescind, we will return to you initial fees you paid us under your Management Services Agreement, if any. We also will give you a full refund of the cost you paid us for any equipment or products you purchased from us, if any, if you return the equipment/product to us, at our expense. We will refund the price of the equipment/product you purchased within 31 days of receiving the equipment or product.

This offer will remain open for thirty (30) days from the date you receive this letter. Please check the appropriate place below and return a signed copy of this letter to me within the time period. If you have any questions, please contact Tade Osikomaiya, Assistant Attorney General, at the Division (410-576-7039).

Sincerely,

[The Company]

cc: Consent Order

ACCEPTANCE OR REFUSAL OF OFFER TO RESCIND AGREEMENT

1. I, the undersigned, acknowledge that I have read the preceding Notice of Rescission Rights and understand its contents.
2. I understand that I have not waived my rights under the Maryland Franchise and Disclosure Law by signing this document.
3. I hereby make the following choice to accept or refuse your offer to rescind my Management Services Agreement:

CHECK ONE

_____ I hereby **accept** your offer of rescission and wish to terminate that Agreement. I agree to not use your trademarks and system and to not use or disclose to anyone the trade secrets and confidential and proprietary information that we obtained from you. Please contact me to arrange for the return to you of products or equipment I purchased from you (if applicable).

_____ I do not accept your offer of rescission. I wish to continue operating under my current Management Services Agreement at this time. I understand that I will be given an opportunity to purchase a franchise once the company's franchise offering has been registered the franchise offering with the securities Division under the Maryland Franchise Law, but I have no obligation to enter into that franchise agreement.

Date

Practice Owner