



**KURTZ LAW GROUP**  
A Professional Corporation

*Franchise Law First and Foremost™*

**Barry Kurtz**

Certified Specialist Franchise & Distribution Law  
The State Bar of California Board of Legal Specialization

**Candice L. Lee**

Of Counsel

**Bryan H. Clements**

Ezra Brutzkus Gubner LLP  
Mark Melton

July 8, 2013

**VIA FEDERAL EXPRESS**

California Department of Corporations  
320 West 4<sup>th</sup> Street  
Suite 750  
Los Angeles, California 90013  
Attn: Shohreh Aram

Re: Advantage Plus Franchisor Inc / File No 993-6898

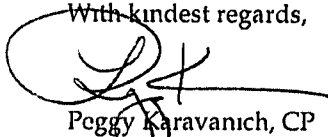
Dear Shohreh,

I am writing to you in response to your e-mailed comment letter dated July 1, 2013. The responses are numbered to correspond to your comments as follows:

- 1 Item 21 has been revised, as requested
- 2 The Internet Exemption Form has been revised, as requested
- 3 Item 11 has been revised, as requested
- 4 The franchisee must complete training prior to opening. No specific timeframe is required. We believe the disclosure on Page 37 is accurate as follows: "The Initial Training Program will consist of approximately 1 – 2 weeks of training that must be completed prior to commencing the operation of your Advantage Plus Franchised Business"
- 5 Item 12 has been revised, as requested
- 6 Item 15 has been revised, as requested
- 7 Item 17 has been revised, as requested

Enclosed are redlined and clean copies of the revised pages. Please date stamp the enclosed copy of this letter and return to our offices in the envelope provided for your convenience. Should you require any further information, please feel free to contact me at (562) 754-8706 or [pkaravanich@kurtzfranchiselaw.com](mailto:pkaravanich@kurtzfranchiselaw.com). Thank you.

With kindest regards,



Peggy Karavanich, CP  
Kurtz Law Group, a Professional Corporation

**To:** Candice Lee

**Subject:** Advantage Plus Franchisor, Inc., Fil3 # 993-6898

**COMMENTS:** I have reviewed the above-named application filed under section 31111 of the Franchise Investment Law ("FIL") on June 27, 2013 and have the following comments. The rules referred to in this letter are under Title 10 of the California Code of Regulations. References to "Item" or "Instruction" mean those matters in the Disclosure Document ("FDD Guidelines")

- 1 Please state the franchisor's fiscal year-end
- 2 Internet Exemption form-Please revise to state "the franchisor and anyone acting with the franchisor's knowledge agrees to comply with the California Franchise Investment Law and Rules thereunder "
- 3 Item 11-Please disclose the cost of computer hardware/software maintenance
- 4 Item 11- Please state how long before the opening the franchisee must complete the training
- 5 Item 12-Please state if the territory is exclusive. If not, please include the following statement: "You will not receive an exclusive territory. You may face competition from other franchisees, from outlets that we own, or from other channels of distribution or competitive brands that we control."
- 6 Item 15- Please disclose the amount of equity interest that the on-premises supervisor must have in the franchise, if the franchisee is a business entity
- 7 Please replace the last sentence under Item 17t (both tables) with "Any representations or promises outside of the disclosure document and franchise agreement may not be enforceable."

Please be advised that this comment letter tolls the automatic effectiveness of the registration, if any. The application will be abandoned in accordance with Rule 250.16 if the requested information is not submitted within reasonable time from the date of this letter. There can be no refund of filing fees paid upon abandonment or withdrawal of the application.

Additional comments may be forthcoming. All material changes to your application must be submitted by pre-effective amendment, in accordance with Rules 310.123 and 310.112, which require a completed facing page on the form used for the original application and an originally signed certification page and corporate acknowledgment, if applicable. Amended materials should be marked to show all changes, in accordance with Rule 310.122.1

No hard copy to follow

Shohreh Aram  
Senior Corporations Counsel  
Department of Business Oversight (formerly Department of Corporations)  
Tel (213) 576-7584

**Effective July 1, 2013, the Department of Corporations and the Department of Financial Institutions merged to form the Department of Business Oversight in accordance with the Governor's reorganization of state departments to provide services more efficiently and effectively.**

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