

From: [Sullivan, Matt W.](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]A voice AGAINST Proposed NASAA Model Franchise Broker Registration Act
Date: Wednesday, June 12, 2024 4:59:34 PM
Attachments: [image001.png](#)

To NASAA:

I understand you are under consideration of significant changes affecting the Franchise Broker market.

I am adamantly opposed to the proposed changes and ask that the proposal be tabled for further study or termination.

I have been a Franchisee for 10 years AND a Franchise Broker for 3.5 years. I have chosen to operate these 2 businesses because of the overwhelming positive impact that I can have on other's lives. Within the past 3.5 years I have helped 32 people navigate the complexities of the franchise selection process and ultimately find the right franchise that fits their specific needs and capacities. Ultimately these 32 people have benefited from my expertise and have been able to achieving their dreams of business ownership. My impact on others have been significantly positive on others – a noble and good profession.

As I learn about the proposed regulations, I can assure you that your well-intentioned regulations will have significant negative impacts on my businesses, on the franchise industry and the economy as a whole.

The regulations appear to be overly broad, increase liability, increase disclosure complexity and as a result will have major unintended consequences. The negative consequences include being: anti-free enterprise, anti-privacy, anti-small business and anti-growth. The regulations will effectively kill or hamper business growth.

In addition, the current FTC regulations and various state regulations are already in place – so the proposed added regulations simply only create widespread complexity and liability.

Please table or terminate the proposed Franchise Broker Registration Act.

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