

June 12, 2024

RE: Public Comments on the NASAA Model Franchise Broker Registration Act

Dear NASAA Representatives,

My name is Brandon Clifford, and I am the CEO of Business Alliance Inc., a membership-based organization comprising franchise brokers, consultants, franchisors, and suppliers. Since 1991, Business Alliance Inc. has been training franchise sales professionals, and offering growth solutions to franchise brands. As a leader in the franchise industry, we strive to be the premium resource of growth for consultants, brands and suppliers in the franchise space. This letter is in response to the Request for Public Comment on the NASAA Model Franchise Broker Registration Act.

Business Alliance Inc (BAI) supports NASAA's efforts to enhance the regulatory framework for third party franchise sellers. The development process of this proposed model act, however, gives us cause for concern. It seems that NASAA primarily considered feedback from a limited perspective, resulting in a proposal that does not fully account for the complexities and needs of all stakeholders in the franchise sales process. To ensure a balanced and effective regulatory framework, it is crucial that franchise broker organizations, franchise broker networks, franchise brokers, and franchise sales organizations are given the opportunity to provide detailed feedback.

We share the goal of promoting responsible franchising and ensuring that prospective franchisees are well-informed and educated. However, the current proposal, as it stands, is unlikely to achieve these objectives. As it currently stands, potential franchise owners are already inundated with questionnaires, applications and disclosure forms. Adding another disclosure, in my opinion, will not only hinder this process, but will cause more confusion than clarity. My recommendation would be to add a section to disclose third party franchise sellers within the current Franchise Disclosure Document.

At BAI we work hard to coach, teach and train our affiliates to always put their clients first in everything they do. Our franchise brokers pride themselves on helping their candidates make smart, informed investment decisions. This is why our franchise partners love being a part of our network. They can feel confident that when they receive a referral from a Business Alliance Inc Affiliate, the candidate will be well prepared, thoughtful in their due diligence, and if a signed agreement comes to fruition, they will become a top-performing franchisee within their network.

Thank you for your attention to this matter. We look forward to working collaboratively with NASAA to achieve our shared goals.

Sincerely,

Brandon Clifford  
CEO  
Business Alliance Inc.