

From: [Josh Arnold](#)
To: [NASAA Comments](#)
Cc: [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]Franchising - Business Critical
Date: Wednesday, June 12, 2024 10:14:30 AM



Subject: NASAA Request for Public Comment – Franchise Broker Registration Act

To Whom it may concern:

I hope this message finds you well. As someone deeply entrenched in the franchising industry for the past decade, with significant involvement in the establishment and growth of Card My Yard, now boasting over 550 locations across 46 states, I write to express my concerns regarding the potential alterations to the Franchise Disclosure process.

Undoubtedly, the franchising sector operates under regulations aimed at transparency and protection of prospective franchisees. A well-run franchisor not only offers a robust business model but also provides essential support, training, and a nurturing community. This comprehensive framework significantly enhances the likelihood of success for franchisees and facilitates scalability. Moreover, the annual audit process ensures the financial viability and stability of franchising entities, albeit at considerable expense.

While I advocate for full disclosure of all fees associated with franchising and acknowledge the role of Franchise Business Consultants, I urge caution in introducing changes that may burden stakeholders unnecessarily. Many of the nation's most successful franchise concepts heavily rely on these consultants to identify qualified candidates. The franchising industry annually contributes to job creation, innovation, and community service through the establishment of hundreds of thousands of new businesses.

However, implementing regulations that are overly complex or cumbersome could deter aspiring entrepreneurs from venturing into business ownership. Such measures may inadvertently stifle one of America's most significant innovations: franchising.

In conclusion, I appreciate your time and consideration of these concerns. It is imperative that any proposed changes to the Franchise Disclosure process strike a delicate balance between transparency and feasibility, ensuring continued growth and prosperity within the franchising sector.

Thank you for your attention to this matter.

Sincerely,
Josh Arnold
President, Card My Yard
A Five Star Company