



In the matter of:

**Solicitation for public comment on the Proposed
NASAA Model Franchise Broker Registration Act**

Respectfully submitted via electronic submission: Kim Perrotta, - Florida, USA

Organization: WorldWide Franchise Development

To: nasaacomment@nasaa.org

Theresa Leets - theresa.leets@dfpi.ca.gov (Chair, Project Group)

Bill Beatty - bill.beatty@dfi.wa.gov (Co-Chair, Section)

Erin Houston - ehouston@sos.nv.gov (Co-Chair, Section)

Dear North American Securities Administrators Association, Inc.,

I am truly grateful for the platform you have provided to share my perspective on the matter at hand. Thank you for considering my opinion.

My name is Kim Perrotta. I have been involved in franchising for nearly four decades, both as a franchisor and a franchisee. I am heavily involved in Franchisee Advocacy and volunteer with SCORE as a mentor. I am currently a Franchisee Consultant/Broker as well.

If you let me keep this short and simple, let me indicate that I **fully endorse the proposed NASAA Model Franchise Broker Registration Act** and hope you will consider going deep into its final construct.

Summarizing my thoughts and opinions will be easily accomplished.

I firmly believe that any entity, organization, employee, officer, or supplier who even slightly touches the "franchise sales curve" from lead generation to closing should be listed and made part of any formal presentation, particularly for this purpose, the FDD and related agreements. Moreover, when things unfortunately go awry, those who have been involved should be held responsible and made accountable. I liken this to the sale of securities, which are highly regulated by FINRA rules in the financial sector.

If the categories of those involved, as indicated above, have a problem with this, then perhaps they should consider another line of business.

Having advocated for registration and more for some time now, this is an absolutely appropriate step in attempts to normalize the relationship between franchisors, affiliates, and FRANCHISEE INVESTORS in a refined effort to be transparent.

501(c)(6) organizations who lobby "for" a portion of this "pre-disclosure" fail to go far enough in their zeal to protect Franchisees but rather concentrate on their franchisor subscribers and oppose most anything that they believe will "compromise" franchising.

The fact is we'll all be lifted and better for proposals such as this and the pending results of the recent solicitation of the Federal Trade Commission's request for comments.

Thank you all once again.

Respectfully submitted,

Kim Perrotta
WorldWise Franchise Development