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To: [NASAA Comments](#)
Cc: [Erin Houston](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov
Subject: [EXTERNAL]Comments to The NASAA Model Franchise Broker Registration Act
Date: Friday, June 14, 2024 12:02:17 AM

To Whom it May Concern within NASAA:

My name is Alicyn Taft. With over twelve years in the franchise industry as an educator, mentor, and franchise broker, I'm writing to provide feedback on the NASAA Model Franchise Broker Registration Act. I appreciate the focus on ethical practices, as this is something I am very passionate about, but I am concerned that the current draft's intricacies might unintentionally harm or impede the franchise sales process. Here are some specific points that immediately come to mind and some suggestions that may help alleviate foreseeable impact, while maintaining what I understand to be the true spirit of the Registration Act in tact:

The proposed requirement for a broad range of multiple disclosure documents in the Model Act I believe risks overwhelming prospective franchisees and can provide false impressions. This can create unnecessary confusion and anxiety, potentially deterring them from pursuing franchise opportunities altogether. I believe the intention of the Act is to help foster informed and transparent decision-making, however an over abundance of disclosures from persons unrelated to the actual brokering process (the skillful guidance and matching and alignment of goals and skill sets) can give the illusion that there are many more parties involved in the actual decision making of their approval or denial through the franchise award process.