

From: [Scott Rubant](#)
To: [NASAA Comments](#)
Cc: [Theresa Leets](#); [Erin Houston](#)
Subject: [EXTERNAL]Request for Public Comment on the Proposed Statement of Policy Regarding the Use of Franchise Questionnaires and Acknowledgments
Date: Thursday, June 13, 2024 5:19:16 PM

To whom it may concern,

Thank you for the opportunity to comment on the proposed statement of policy (SOP) regarding the use of franchise questionnaires and acknowledgments. I have been a franchise owner of Premier Martial Arts since 2019. The business model that we were sold from a franchise broker, Franchise Fastlane, was sold to us with fraudulent intentions.

I encourage NASAA to adopt the proposed SOP for the reasons below that I was duped by a Franchise Broker and am now 100's of thousands of dollars in debt.

The following items were part of their sales pitch in which none of these items are true.

1. Semi absentee business model. FALSE - for the first 3 years I had to work 40+ hours in the business while also working in my corporate job.
2. 48% average EBITDA - FALSE. In the 4 years of operation I have been profitable for only 3 months.
3. Only 1-1/2 employees - FALSE. I have had to have 3 people on staff most of the time to not have employees quit. 1-1/2 employees cannot run this business.
4. No martial arts experience - FALSE. I have seen that the only franchisees that have been able to slightly succeed have been martial arts experienced owners. And these owners are in the daily operations of the business.
5. Validators and financial numbers represented in the FDA were from Legacy schools that operated larger footprints and were run by martial artists.

Please reach out to me if you have any questions.

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