

From: [Howard Barouxis](#)
To: [NASAA Comments](#)
Cc: [Kerry Finegan](#)
Subject: [EXTERNAL]Comment on NASAA Model Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 4:53:44 PM

Dear NASAA Project Group,

My name is Howard Barouxis, Principal of HQ Franchises. I've worked in the franchising sector since 2020 and have operated as an independent franchise broker since 2025. I appreciate the opportunity to provide input on the proposed Model Franchise Broker Registration Act.

I share and support the initiative's intent to raise the bar for ethics and education in franchising. These are goals that align closely with the professional values of franchise brokers, whose work is built on matching qualified individuals with franchises that meet their goals and capabilities.

That said, I'd like to raise a few concerns regarding the current framework of the proposal:

As an independent broker, I function more like a recruiter than a salesperson. My role is to introduce vetted candidates to franchisors. I neither provide disclosure documents, nor do I make offers on behalf of franchisors. I have no authority to obligate a franchisor in any way, and the final decision lies entirely between the candidate and the franchisor.

The proposed language appears to group all parties involved in franchise sales under one regulatory umbrella, despite material differences in our roles and responsibilities. This could unintentionally complicate compliance and limit access to key referral channels—particularly for newer franchise systems that depend on brokers for exposure and growth.

I would support the creation of a national education standard for franchise brokers that could be recognized across state lines. Such a measure would address consistency and quality without disrupting the practical operations of franchise brokerage, especially for emerging brands.

I appreciate the opportunity to share this perspective and welcome the chance to collaborate on policy that supports ethical growth in the franchise ecosystem.

Sincerely,

Howard Barouxis

Principal, HQ Franchises

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