

From: [Scott Elliott](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Cc: ipbfranchise@ag.ny.gov; [Shamiso Maswoswe](#)
Subject: [EXTERNAL]Comment on Proposed Model Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 9:38:11 PM

Dear Members of NASAA and State Regulators,

My name is Scott Elliott, and I am the founder of New Chapter Consulting LLC, a franchise consulting business in the State of New York. I started working in this profession in 2025.

I work closely with individuals to guide them through one of the most significant decisions of their lives. These candidates are coming to rely on me to help them evaluate opportunities, understand risks, and connect with the right resources. Careful education and guidance can lead to thriving small businesses that create jobs and generate tax revenue in our communities.

In my short tenure, I have received zero complaints from candidates or franchisors. To the contrary, I have been publicly commended in reviews for my honesty and helpfulness in this important work.

While I appreciate the intent behind NASAA's proposed act, I am deeply concerned that its current form is overly broad and imposes an **excessive regulatory burden** that will negatively impact small businesses, restrict consumer choice, and slow entrepreneurial growth.

Concern

The **overly broad definitions** in the act combine very different roles (franchise recruiter brokers, franchise sales organizations, and franchisor representatives) into one category, even though these functions are not the same. Recruiter brokers, in particular, do not sell franchises. We introduce candidates to franchisors, who alone decide whether or not to award a franchise. Treating these groups identically risks regulating away an essential referral function that helps candidates explore the market responsibly.

Solution

I recognize that some brokers may lack adequate education about state laws. However, based on my experience, those cases are few compared to the positive impact brokers provide. A more effective and less burdensome solution would be to implement an educational and licensure program that includes state-specific modules, rather than requiring duplicative registration and training in all 50 states.

This approach would:

- Provide regulators with confidence that brokers are educated and accountable.
- Significantly reduce costs and administrative burdens for both brokers and states.
- Ensure candidates continue to receive educated guidance across state lines.

Additionally, I strongly urge that **automatic reciprocity between states** be a requirement of any final rule. Franchise brokerage is not a localized business, and duplicative filings only add cost without improving consumer protection.

Closing

In my work, I see every day the importance of aligning aspiring business owners with the right franchise opportunity. The current proposal risks creating unintended consequences: fewer brokers, fewer choices for candidates, and fewer new businesses launched in our states. That outcome would harm consumers, small business growth, and state economies alike.

I respectfully ask that you reconsider the proposed act and work with franchise broker leaders, franchisors, and attorneys to create a solution that balances education and accountability with accessibility and fairness.

Thank you for your time and consideration.

Sincerely,



Scott Elliott

cc



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