

From: [Brenan Compretta](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov
Subject: [EXTERNAL]Comment on Proposed NASAA Model Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 5:02:03 PM

Dear NASAA Officials:

I am writing to express my strong opposition to the proposed NASAA Model Franchise Broker Registration Act. As a small franchise broker who has been helping prospective franchisees identify and evaluate opportunities for the past six years, I am deeply concerned about the harmful unintended consequences this legislation would impose on my business and the franchise industry as a whole.

Excessive Regulatory Burden

The proposed registration requirements would create an undue administrative and financial strain on small operators like myself. The compliance costs alone could drive many of us out of business, reducing the availability of trusted resources for entrepreneurs who rely on brokers to navigate complex franchise decisions.

Overly Broad Definitions

The definition of “franchise broker” within the Act is far too expansive. It would unnecessarily capture individuals who merely provide referrals or general information—professionals not directly engaged in franchise sales. Forcing these individuals to register would create confusion and discourage legitimate business activity.

Unrealistic Record Retention Requirement

The proposed five-year record retention mandate far exceeds common business standards and even IRS requirements, which typically require three years. Imposing such an excessive obligation is impractical and disproportionately burdensome for small businesses.

For these reasons, I respectfully urge you to reconsider this legislation or, at a minimum, narrow its scope significantly to avoid crippling the very businesses that provide valuable guidance to aspiring franchise owners.

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Respectfully,
Brenan Compretta
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