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To: casework@kelly.senate.gov; Scheduling@gallego.senate.gov; [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 2:20:23 PM

Dear NASAA Officials,

My name is Lane Klastow, and I am a franchise consultant who has dedicated my career to helping entrepreneurs and families achieve business ownership through franchising. I run a small business in Phoenix, and like many independent brokers across the country, I put in the time, energy, and resources to guide clients toward opportunities that fit their goals, skills, and finances. I work directly with hundreds of franchise brands, and my services are always free to the client because the franchisor pays my fees, similar to how a real estate agent works for home buyers.

That is why I feel compelled to strongly oppose the proposed NASAA Model Franchise Broker Registration Act. While I understand the intent of ensuring transparency and accountability, the way this Act is written would create damaging and unnecessary barriers for small operators like me.

Excessive Regulatory Burden

The proposed registration process is not just paperwork, it is an administrative mountain that would take valuable time and resources away from helping my clients. The compliance costs alone could put many small brokers out of business. If that happens, the very people who would suffer most are the aspiring franchisees who rely on us for unbiased guidance and education.

Overly Broad Definitions

The Act's definition of "franchise broker" is far too broad. It sweeps up professionals who simply make introductions, referrals, or provide information, individuals who are not engaged in actual franchise sales. This overreach would force countless business professionals to register unnecessarily, creating confusion instead of clarity.

Operational Challenges

The requirement to retain records for five years is excessive and far out of step with standard practices. Even the IRS requires only three years. Imposing a five year mandate adds an unnecessary operational burden that does nothing to better protect consumers.

In closing, I respectfully urge you to reconsider or significantly modify this proposed Act. Independent brokers like myself play a critical role in connecting entrepreneurs to life changing opportunities. Adding heavy handed regulation will not protect franchisees, it will only shrink the support system they need to make informed decisions.

Thank you for your time and consideration.

Sincerely,

Lane Klastow

Consultant / The Franchise Consulting Company

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