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**To:** [NASAA Comments](#); [Theresa Leets](#); [bill.beatty@dfi.wa.gov](mailto:bill.beatty@dfi.wa.gov); [Erin Houston](#)  
**Subject:** [EXTERNAL]Comment on Proposed NASAA Model Franchise Broker Registration Act  
**Date:** Wednesday, August 27, 2025 3:06:47 PM

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Dear NASAA Officials,

My name is Tamika, and for the past five years I have worked as an independent franchise broker. In that time, I have had the privilege of guiding people. many of them first-time entrepreneurs, through one of the most important decisions of their lives. I know firsthand how overwhelming the franchise search process can feel, and my role has always been to simplify, educate, and support for candidates so they can make informed choices for themselves.

That is why I am deeply concerned about the proposed NASAA Model Franchise Broker Registration Act. While I understand the intent to strengthen oversight, the reality is that the Act, as written, would unintentionally push out small operators like me and limit access to the personalized support that future franchisees need.

### **The Burden on Small Brokers**

The proposed registration, licensing, and reporting requirements may seem manageable on paper, but in practice, they represent significant costs and administrative work. Larger organizations may be able to absorb those burdens, but for independent brokers, it could mean closing our doors. This would not only impact our livelihoods, but also leave countless aspiring business owners without support at a critical stage of their journey.

### **Definitions That Go Too Far**

Another concern is the overly broad definition of “franchise broker.” As written, the Act would require registration from people who are not truly franchise brokers, such as those who make occasional referrals or share general information. That kind of overreach does little to protect consumers and creates unnecessary red tape for professionals far outside the scope of franchise consulting.

### **Record Keeping Requirements**

Finally, the proposed five-year record retention standard exceeds typical IRS and business practices. Most small businesses retain records for three years. Extending this to five years would impose additional costs and operational strain without a clear consumer benefit.

I believe in thoughtful regulation, but this Act in its current form would do more harm than good. It risks silencing the voices of independent brokers, which are the very people who sit down every day with entrepreneurs to help them evaluate their franchise options and avoid costly mistakes through education.

I urge you to reconsider or significantly narrow the scope of this legislation to ensure it protects without unintentionally eliminating the resources that so many future franchisees rely on.

Respectfully,

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