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**Subject:** [EXTERNAL]Comment on Proposed NASAA Model Franchise Broker Registration Act  
**Date:** Wednesday, August 27, 2025 3:20:51 PM

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I am writing to express my strong opposition to the proposed **Model Franchise Broker Registration Act**.

My name is Ann Power, As a **small business owner and franchise consultant with over 30 years of experience in the franchise industry**, I have worked with professionalism, integrity, and a passion for helping others achieve business ownership through franchising. Over these three decades, I have **helped hundreds of people** realize their entrepreneurial dreams and have done so with **zero complaints or regulatory issues**—a track record I take immense pride in.

The proposed Act would impose **redundant, confusing, and costly burdens** on consultants like myself, who already operate under a strong ethical framework and established best practices. Requiring registration, compliance tracking, and duplicative education on a **state-by-state basis** would not only be **administratively overwhelming**, it would also place a disproportionate **financial strain on small business operators**.

**Fees** - The fees per state are overly burdensome. The fees are likely more expensive than what a franchisor has to pay to file in every state in the country (roughly \$15,000 annually). Is this about generating fees or ensuring compliance and knowledge of your laws? The independent recruiter franchise broker, if the Model Act is adopted by all 50 States, will be subject to:

1. 50 different examinations,
2. 50 different examination fees,
3. 50 different application fees,
4. 50 different amendment fees,
5. 50 different renewal fees,
6. 50 different continuing education programs,
7. 50 different continuing education fees, and
8. will potentially be put out of business if they don't meet 50 different financial qualifications/requirements. The 5-year record retention requirement far exceeds standard business practices

and IRS requirements. I urge you to reconsider this legislation or significantly modify its scope to avoid harming the small businesses that provide valuable services to the franchise community.

**9. Interest of the State** — The state's interest is to foster entrepreneurship that creates jobs and taxes. However, increasing the regulatory burden on people who want to bring businesses to the state prevents new businesses from happening.

Unlike large institutions or legal firms with compliance departments, I—and many of my peers—**run lean, independent consulting businesses**. We do not have the resources to navigate a fragmented web of state filings, fees, inconsistent training requirements, and local legal counsel. This would force many of us to **reduce the scope of our services, increase fees to candidates and franchisors, or exit the industry entirely**—ultimately hurting the very entrepreneurs and franchise systems this legislation claims to protect.

We understand the desire for oversight and education. In fact, we **welcome the opportunity to improve industry standards**. But the solution must be reasonable, scalable, and reflective of how the franchise broker profession actually operates: **nationally**, not locally.

Rather than an inefficient patchwork of state-level regulation, I urge lawmakers to consider a **national common education program**—a centralized platform built in partnership with leading franchise broker networks and respected franchise attorneys. This course could include **all state-specific regulatory content**, ensuring brokers are trained to operate responsibly in any jurisdiction.

Furthermore, I strongly recommend that **automatic reciprocity between states** be built into the Act for both **registration and educational requirements**. This would reflect the reality of how brokers support candidates and brands across state lines and ensure compliance without crushing small businesses with repetitive, inconsistent, and expensive processes.

In closing, I support improving broker education and accountability—but not at the cost of **punishing ethical operators**, damaging small businesses, and restricting consumer access to experienced, helpful guidance. Please consider more thoughtful, collaborative alternatives that elevate our profession without destroying it.

Thank you for your consideration

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**Warm Regards,**

**Ann Power**

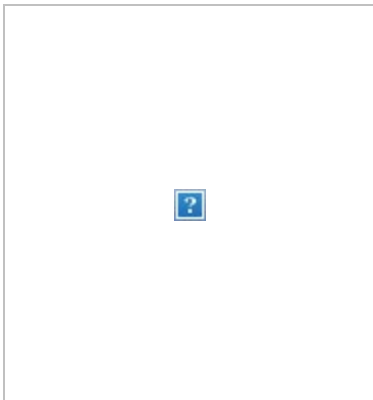
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**schedule time on my calendar: [calendly.com/ann-power-franchise-consultant](https://calendly.com/ann-power-franchise-consultant)**



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