

From: [Bruce Brady](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]Comments on NASAA Model Franchise Broker Act
Date: Wednesday, August 27, 2025 5:00:21 PM

To whom it concerns,

I am a franchise CONSULTANT with FranChoice. I have been working in this role for about 5 years and owned my own franchise business for longer. I have helped tons of people to determine if franchising is the right path for them, even before introducing them to franchises. My role is to guide people ethically through a process to determine if they should/can be small business owners and if so, which franchises are the right options for them. Therefore, I act as a lead source for franchises and connect them with perfect fitting franchises businesses where the franchise sales staff then takes them through the specific sales process for that franchise company.

Since our role at FranChoice is that of consultants and NOT salespeople, we should not be covered in any requirements/laws that we are part of the franchise sellers because that is not what we do. The new regulations would be unnecessary, burdensome, costly and duplicates of rules already in place. If there are additional safeguards, these should be handled by the FTC on a national level.

Thanks for your consideration in this matter

Bruce



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