

From: [Jennifer Lucas](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#); [Kerry Finegan](#)
Cc: [Matt Lucas](#)
Subject: [EXTERNAL]Feedback on NASAA Proposed Model Act
Date: Wednesday, August 27, 2025 8:38:04 PM

Dear NASAA Project Group,

My name is Jennifer Lucas, and I am a franchise consultant alongside my husband with decades of experience in the franchising industry. We have owned our own franchise, we have started a franchise from the ground up, and we are now consulting potential candidates by acting as a broker. Franchising paved our future, and we want to show others how it can pave theirs. Because of this, I would like to share my feedback regarding the NASAA Proposed Model act.

I appreciate this opportunity to provide feedback, and to share thoughts on collaborative solutions that both protect candidates and support healthy franchise growth.

Key Points:

- **Value of Franchise Brokers**

- Franchise brokers play an essential role in aligning candidates' goals, skill sets, and investment levels with the right franchise opportunities.
- When alignment is missing, failure rates increase dramatically.
- Brokers serve as educators, guiding candidates through due diligence, connecting them with vetted professionals (franchise attorneys, accountants, funding sources), and ensuring they make informed decisions.

- **Franchise Brokers as Assets, Not Risks**

- Brokers add value to the franchise award process by promoting transparency and accountability.
- We reduce risk for franchisors and franchisees by ensuring candidates understand responsibilities and evaluation steps.

- **Concerns with State-by-State Fees**

- A fragmented fee structure would harm franchisors, prospective franchisees, and brokers alike.
- Instead, one **national educational program** would address legitimate education concerns without placing undue financial or administrative burden on states, franchisors, or brokers.

- **The Marketplace Has Changed**

- Regional territory restrictions no longer reflect today's national, online-

driven franchise development marketplace.

- Historically, regional models worked, but as the industry evolved, networks with outdated models struggled.
- Reintroducing state-by-state registration requirements would be a step backward, harming business growth in each state.

Collaboration is key. A balanced, modernized approach—such as a national education course—supports consumer protection while allowing franchising to continue driving economic growth and local job creation.

Thank you for your consideration and for your commitment to strengthening the franchise ecosystem.

Sincerely,
Jennifer Lucas

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Envisioning Success,
Jennifer Lucas



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P.S. One of the best compliments is a referral.

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