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To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 2:59:14 PM

8-27-25

Subject: Franchise Broker Registration Act

Dear Sirs,

My name is Larry Weaver. I have been involved in franchising since 1986. I have been a franchise broker consultant since June of 2018. I have assisted hundreds of potential franchise entrepreneurs to obtain their dream of business ownership thru franchising. In some cases that even involves giving them the tough advice to not get into their own business when it was obvious to me that they should not own their own business. For those that I have helped to obtain that dream, their businesses employ thousands of folks that are then generating taxes and expendable income in their communities. That has included ownership in nearly 20 different States including CA.

There are many aspects of this act that will be detrimental to the Franchise business and to the thousands of franchise consultants like myself.

The very broad definitions will make it exceedingly difficult to maintain all of the requirements to execute the consultant role under the many regulatory requirements.

The potential fees and fines for any non-compliance pose an unacceptable risk to individual consultants.

I believe that an unintended consequence will be that the majority of Broker consultants will choose to not do business in any State that adopts this type of oversight. That will then limit the help that someone looking for that dream of business ownership thru franchising will be able to obtain. Many of those folks don't have the franchise knowledge that a consultant can provide to make sure they pick a franchise business that is the right fit. That could lead to more business failures.

I would suggest a National education course that all franchise Broker consultants could be required to take so that they would then all have the basic understanding of franchise laws.

For me, if CA does indeed move forward with the Franchise Broker Registration Act, I will follow in the footsteps of what I believe will be the majority of the Franchise Brokers in this country and choose to not do business in CA.

I am hopeful that a more amenable plan can be adopted instead of this Act.

Sincerely,

Larry Weaver

Consultant / The Franchise Consulting Company

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