

From: [Mark Johnson](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#); [Kerry Finegan](#)
Subject: [EXTERNAL]Industry Experience - Comments on NASAA Model Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 4:54:18 PM

Dear NASAA Project Group,

With over 35 years of experience in business ownership and franchising and close to a decade as a franchise broker, I have had the privilege of helping hundreds of entrepreneurs and franchisors find the right fit and grow successful businesses. Early in my career, I launched and scaled an independent company before franchising it to more than 350 locations across 10 countries. After selling the business, I dedicated myself to serving as a broker, guiding others on their own entrepreneurial journeys.

In that time, I have worked with brands at every stage of growth and with individuals from a wide range of backgrounds. My goal has always been to connect the right people with the right opportunities, ensuring long-term success for both sides. In all my years as a broker, I have maintained a spotless record with zero complaints; a reflection of my commitment to ethical practices and the success of those I serve. While I recognize that some brokers operate unethically, I also know from firsthand experience that many of us are raising standards, not lowering them.

Industry Knowledge

Legitimate brokers play an indispensable role in franchising, serving as a trusted bridge between brands and buyers. The proposed regulation would unfortunately sweep away many ethical professionals while doing little to stop bad actors who already ignore existing laws.

Real-World Impact

Broker partnerships often provide the critical lift that allows emerging brands to compete with established systems. Without these relationships, the franchise landscape risks consolidating into a few dominant players, stifling innovation and limiting opportunities for entrepreneurs.

Practical Concerns

The proposed registration requirements are unworkable in practice. Brokers regularly work across multiple states and brands, and the compliance costs and administrative burdens would prove prohibitive for many honest operators, ultimately reducing access to the very expertise that helps safeguard prospective franchisees.

Alternative Solutions

We fully understand that some brokers are operating unethically. However, those individuals represent a very small fraction of the industry. Broad regulation risks punishing the majority of professionals who are operating with integrity. Instead, I suggest:

- **A Common National Education Platform:** Rather than fragmented, state-by-state requirements, implement one national educational component to ensure consistency and elevate professional standards across the board.
- **Reciprocity Between States:** Brokers do not operate in a localized capacity. A reciprocity requirement in legislation would better reflect the realities of this business model and reduce unnecessary duplication of compliance efforts.
- **Focused Enforcement:** Strengthen the enforcement of existing laws against fraud and misrepresentation, which are already designed to address unethical practices.

Franchising has created millions of jobs and thousands of thriving small businesses. Please don't let well-intentioned regulation dismantle the trusted relationships and practical expertise that make this possible.

Respectfully,

Mark Johnson

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