

From: [Natalie Gold](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Cc: [Jeff Elgin](#)
Subject: [EXTERNAL]Model Franchise Broker Registration Act
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To Whom It May Concern:

My name is Natalie Gold. I have been a Franchise Consultant for more than six years and with FranChoice for nearly two. I am writing to clarify my role and submit comments regarding the proposed regulation.

The Role of FranChoice Consultants

FranChoice and its consultants are not *franchise sellers*. Our role is limited to generating and passing qualified leads to franchisors, who then conduct the sales process through their own employees or independent contractors (FSOs). In this respect, we function much like advertising platforms such as the International Franchise Association, *Entrepreneur.com*, Facebook, or LinkedIn.

Including referral sources and marketing channels within the statutory definition of “franchise broker” is a mischaracterization. The current language—broad enough to include anyone *indirectly* involved in the sales process—is overly expansive and risks creating serious unintended consequences. This could inadvertently capture lending partners, wealth managers, or any professional who merely refers a prospective candidate to a franchisor.

Unnecessary Regulation of Actual Sales Brokers

For those who truly are engaged in franchise sales, the proposed rule adds little benefit. Federal and state laws already govern disclosures, advertising practices, and ethical standards. Imposing an additional regulatory layer would be redundant, costly, and administratively burdensome—particularly for smaller operators already working within tight margins.

The Problem of Fragmented State-Level Rules

Allowing individual states to create their own disclosure regimes, each with separate fees and requirements, would create a confusing and costly patchwork of obligations. Such fragmentation would complicate compliance, increase costs, and discourage qualified professionals from assisting entrepreneurs. If additional oversight is deemed necessary, it should remain with the FTC, ensuring consistency and clarity nationwide.

Conclusion

In short, FranChoice and similar organizations act as lead sources, not franchise sellers.

Expanding the definition of “franchise broker” to include us is not only inaccurate but harmful, as it creates unnecessary burdens without improving consumer protections. I urge regulators to narrow the definition, avoid duplicative requirements, and ensure that any additional oversight is implemented uniformly at the federal level.

Sincerely,

 **Natalie Gold**
Certified Franchise Consultant
Franchise Gold Consultants



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