

From: [Peter Lagarias](#)
To: [NASAA Comments](#)
Cc: Theresa.Leets@dbo.ca.gov
Subject: [EXTERNAL]NASAA Franchise Broker Act
Date: Wednesday, August 27, 2025 11:55:55 AM

To NASAA:

I write in support of your proposed Model Franchise Broker Act.

Much like the franchise disclosure acts of sixteen states and the FTC Franchise Rule, this Model Act provides for disclosure. Unlike the FTC Act, and like many state laws, there is also a requirement for registration by franchise brokers.

As franchise brokers are often the first contact with prospective franchisees, and many continue through a franchise sale. Inclusion of franchise brokers as parties to register and disclose specified information (including prior lawsuits) is useful.

In our private practice we have seen deception and fraud by franchise brokers, not just franchisors, and we accordingly support providing a model act for states to adopt (I represented franchisees for over forty years in counseling, arbitrations, and litigation, but I am winding down from active litigation).

In my opinion franchise brokers engaging in above board practices, while having some cost in registering and disclosing, may welcome this potential legislation to weed out the miscreants in the industry.

Peter Lagarias

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