

Dear NASAA Officials:

I am writing to express my strong opposition to the proposed NASAA Model Franchise Broker Registration Act. As a franchise broker who has been helping prospective franchisees find suitable opportunities for 5 years, I am deeply concerned about the unintended consequences this legislation would have on my business and the industry as a whole.

My name is Charista Baye and I am a franchise broker associated with both the FBA and IFPG. I absolutely love my job and love helping people find the best fit for their specific situation. I was in the advertising industry and also a business owner before I got into the franchise world. Since 2020 I have personally helped over 40 different people find a franchise. I also assisted with more than that with other brokers in the business. Maybe more importantly, I have worked with hundreds more who chose that a franchise was not the best fit for them. That is also an important part of my job to protect people from making a poor choice for them that would be detrimental to their personal and financial life.

I have never had any complaints or lawsuits against me personally or my business. Many of the people I have helped have gone on to win awards within their franchise: Rookie of the Year, Franchise of the Year, etc. I will include screenshots of reviews that my candidates have given me at the end of my email.

I support the development of standardized national education requirements that could be reciprocally recognized across states. This would address educational concerns while maintaining the viability of franchise brokerage services for emerging brands.

I welcome the opportunity to work collaboratively with regulators to develop effective solutions that serve all stakeholders in the franchising community. My contact information is at the bottom of this email if you'd like to get ahold of me.

I want to address specific concerns that I have in regards to this proposed legislation. I'm concerned that you have some details that are not entirely correct in regards to what we do and do not do. My main concerns are around the broad definitions of our role, the excessive regulatory burden, the unintended consequences and some proposed solutions. I will detail each one below.

Overly Broad Definitions/Industry Role Clarification

As an independent franchise broker, I serve as a referral source - similar to an employment recruiter who introduces qualified candidates to potential employers. I do

not have authority to bind franchisors, cannot provide franchise disclosure documents, and am contractually prohibited from making franchise offers. The eventual franchise decision remains entirely between the franchisor and the candidate. The definition of "franchise broker" in the Act is far too broad and would capture individuals who simply make referrals or provide information, not those actually engaged in franchise sales. This would require countless business professionals to register unnecessarily.

Excessive Regulatory Burden

The proposed registration requirements would create an overwhelming administrative burden for small operators like myself. The compliance costs alone could force many of us out of business, ultimately reducing the resources available to help prospective franchisees navigate their options. I would ask that you allow for national reciprocity between states.

Unintended Consequences

Many brokers provide valuable education about franchise ownership, helping people understand the process and make informed decisions. Losing this resource would leave prospective franchisees with fewer guidance options. Brokers often provide access to emerging and innovative franchise concepts that prospective franchisees might never discover otherwise. Eliminating these intermediaries reduces choice and opportunity. Many people rely on brokers to navigate the complex world of franchise ownership.

I urge you to reconsider this legislation or significantly modify its scope to avoid harming the small businesses that provide valuable services to the franchise community.

Proposed Solutions

We respectfully suggest consideration of:

- National reciprocity agreements between states
- Standardized education requirements that brokers could complete once rather than state-by-state
- Regulatory frameworks that differentiate between different types of franchise sales participants based on their actual roles and authorities

Here are some testimonials from people that I have worked with taken straight from my LinkedIn and Google Listing:



Farris Roach III · 1st

Owner/President of Voda Cleaning and Restoration E. Tampa/Philanthropist/Photographer/Lover Of Life
November 15, 2024, Farris was Charista's client

Charista, Was instrumental in my search for the best professional options to expand my career. She was thoughtful and very eager to assist me with finding the right match for my goals. I truly appreciate her passion to help others achieve their dreams.



Eric Offenberberg · 1st

Partner Sales Leader - Americas | Strategic Partner Growth Expert

November 15, 2024, Eric was Charista's client

Charista was instrumental in helping my wife and I purchase our first franchise. Her initial presentation was thorough and provided a multitude of opportunities to pursue. As we narrowed down a franchise selection, Charista ensure was asked the right questions of the franchisor to ensure we truly understood our undertaking. Eventually we pulled the trigger and a year and a half later could not be happier our choice. I would recommend her knowledge and expertise to anyone looking to get involved or expand in franchising.



David Thomason

4 reviews · 0 photos



★★★★★ 39 weeks ago

It was my pleasure to work with Charista. I have worked with several franchise brokers and Charista was by far the best. She listened to my interests and brought me excellent brands to consider. I trust her opinion and experience. She sincerely cares about her clients best interests! Highly recommend Charista!!!



Reynaldo M Gonzales

Local Guide · 6 reviews · 2 photos



★★★★★ 1 week ago **NEW**

If you've been thinking about owning a business -- reading articles, watching videos, trying to figure out what "the catch" is when something sounds too good to be true, but failing to find something to inspire you enough to take the plunge -- reach out to Charista. You will thank me.

I dreamt of owning my own business for years but struggled with finding the right brand. I was referred to Charista who worked with me to find a great fit. Charista's approach is similar to that of a matchmaker -- she evaluated my interests, strengths, and weaknesses before presenting me with a portfolio of opportunities. After her presentation, I worked with Charista to refine my choices and she guided me every step of the way until I settled on a brand. I am so grateful that I was able to leverage Charista's knowledge of franchises to identify a brand that I was completely unaware of when I started my journey. Without Charista and her team, I am confident that I would have missed out on a fantastic business opportunity.

Respectfully,
Charista Baye
Franchise Inspectors (Formerly Thoughtful Franchise Brokers)
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