

From: [Kirk Loard](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#); [Noula Zaharis](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act
Date: Wednesday, August 27, 2025 6:11:12 PM

Dear Project Group,

My name is Kirk Loard, and I spent nearly two decades as a multi-unit franchise restaurant owner/operator before transitioning into my current role as a franchise broker. Today, I work with aspiring entrepreneurs, including many immigrants, minorities, and first-time business owners, to help them evaluate, fund, and connect with franchise businesses that align with their skills, lifestyle goals, and budgets.

I'm reaching out because I'm concerned the proposed NASAA Model Franchise Broker Registration Act misrepresents what franchise brokers actually do. I am not a salesman, I'm an educator and guide. I don't sell franchises. I help candidates understand their options, avoid costly mistakes (like the ones I made early on), and make informed decisions about business ownership. My services are free to the candidate and are designed to empower, not pressure.

During my years as a franchise broker, I have never received a complaint from one of my candidates. Through my training as an FBA broker, I am well-versed in the laws and regulations that govern our work. I support a **standardized education process with a compliance exam** that would have automatic reciprocity between states, as this would ensure quality, consistency, and accountability without burdening candidates or restricting access to support.

My job is to help people change their lives and their future, and business ownership is just that powerful. Franchise brokers are often the first point of support for underrepresented entrepreneurs navigating an unfamiliar industry. The additional regulatory burdens proposed in the model act would not only mischaracterize our role but could also unintentionally reduce access to this kind of education and mentorship, ultimately harming the very people who benefit most from it.

Please reconsider the potential impact of this act on your state's business climate and entrepreneurial growth. I'd welcome the opportunity to share more about what we do and how brokers like me help strengthen the small business ecosystem every day.

Thank you for your time and consideration.

Warm regards,
Kirk



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