

From: [Dan Goldbeck](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act
Date: Wednesday, August 27, 2025 4:13:21 PM

Dear NASAA Officials:

I am writing to express my strong opposition to the proposed NASAA Model Franchise Broker Registration Act. Coming from a Corporate World previously, I have found franchising to be a life changing opportunity and I've made it my mission to help enlighten and educate others who have a similar background. I take this role and responsibility very seriously and am deeply concerned about the unintended consequences this legislation would have on my business and the impact I'm able to make. Below is a summary of my opposition:

- **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.
- **Overly Broad Definitions:** 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.
- **Operational Challenges:** The 5-year record retention requirement far exceeds standard business practices and IRS requirements. Most businesses retain records for 3 years, making this requirement both excessive and impractical.

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.

Respectfully,

Dan Goldbeck

Franchise Consultant / The Franchise Consulting Company

Cell: 414-687-8395

Schedule Meeting: <https://calendar.app.google/Wc6KZ9NwEP78rFU6A>



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