

**From:** [Rick Hudson](#)  
**To:** [NASAA Comments](#); [Theresa Leets](#); [bill.beatty@dfi.wa.gov](mailto:bill.beatty@dfi.wa.gov); [Erin Houston](#)  
**Subject:** [EXTERNAL]NASAA Model Franchise Broker Act  
**Date:** Wednesday, August 27, 2025 3:06:45 PM

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Dear Project Group,

I am Rick Hudson, President & CEO of BizVendr, a franchise consulting firm based in Irvine, California. I have been a licensed real estate broker in California since 1992 and have spent more than 22 years in the franchise industry. Over these decades, I have worked with franchisors, franchisees, and hundreds of aspiring entrepreneurs, helping them identify, evaluate, and successfully invest in franchise opportunities across dozens of concepts. My record is clear—no complaints, no lawsuits, no dissatisfied clients—because my goal has always been to leave every party on either side of the transaction better off than when they began the process. I am also the author of ***The Ultimate Franchise Buyer's Guide***, a 235-page guide with an accompanying workbook I self-published (at my own cost) and provide free of charge to investors in the generous support of helping them make safe, well-informed franchise decisions.

I serve aspiring entrepreneurs from diverse communities throughout the United States, including immigrants and minority groups, who rely heavily on the expertise and guidance of independent professionals like me. Brokers and Consultants are often their only accessible resource to navigate the complex process of evaluating franchise opportunities. We play a critical role in educating investors on due diligence, connecting them with attorneys, accountants, and funding sources, and aligning their goals with the right franchise system. Without this support, these groups face dramatically higher risks of failure and fewer pathways to business ownership.

I am gravely concerned about the Franchise Broker Registration Acts because they will unleash **devastating and unintended consequences** for consumer choice and entrepreneurship. These Acts duplicate protections already covered under federal and state franchise laws, deceptive trade practice statutes, fraud protections, and disclosure requirements. Worse still, these Acts rewrite our role entirely — falsely casting recruiter franchise brokers as something we are not. Brokers do not sell franchises. We do not control the award process. We serve solely as educators and introducers — and it is always the franchisor who determines whether a candidate is awarded a license. Simply, we just do not have the role in the process that the potential Act seeks to regulate against.

The proposed model, with its duplicative state-by-state examinations, continuing education mandates, and layers of fees, will effectively wipe out independent brokers. If adopted in 50 states, the cumulative burden will drive countless professionals out of the marketplace entirely. This will leave aspiring entrepreneurs stranded without guidance, shrink consumer choice, choke off emerging brands, and disproportionately harm underrepresented groups who already face systemic barriers to ownership.

There is a better path forward. A **national framework with automatic reciprocity**

**between states** should be the foundation of this regulation. Franchise development is a national marketplace, not a localized one. A single, standardized education program that includes state-specific modules would provide consistency, strengthen consumer protection, and eliminate the unnecessary duplication that only serves to create financial barriers and protect entrenched interests.

If these Acts move forward as written, the result will be fewer entrepreneurs starting businesses, fewer jobs created, and slower economic growth in every state. Regulation should support entrepreneurship..

Please reconsider the Act's influence, its necessity, and the serious harm it will cause to the nation's business climate and to consumer choice. The consequences of moving forward with this model will be long-lasting, and deeply damaging.

Sincerely,  
Rick Hudson  
President & CEO, BizVendr

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