

From: wayne@franchiseangelsllc.com
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act
Date: Wednesday, August 27, 2025 3:51:29 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Project Group,

My name is Wayne Angel, and I have been a franchise broker in Atlanta, Georgia for the past four and a half years. During that time, I have helped numerous individuals with an entrepreneurial spirit launch new franchise businesses in their local communities thus creating jobs and adding to their local tax base.

I am concerned about the proposed Franchise Broker Registration Acts because it runs counter to the intent of the recent Executive Order to the Federal Trade Commission dated April 9, 2025.

Specifically, under Sec. 3. Rescinding Anti-Competitive Regulations. (a) Agency heads shall, in consultation with the Chairman of the Federal Trade Commission (Chairman) and the Attorney General, complete a review of all regulations subject to their rulemaking authority and identify those that:

- (i) create, or facilitate the creation of, de facto or de jure monopolies;
- (ii) create unnecessary barriers to entry for new market participants;
- (iii) limit competition between competing entities or have the effect of limiting competition between competing entities;
- (iv) create or facilitate licensure or accreditation requirements that unduly limit competition;
- (v) unnecessarily burden the agency's procurement processes, thereby limiting companies' ability to compete for procurements; or
- (vi) otherwise impose anti-competitive restraints or distortions on the operation of the

free market.

As proposed, the NASAA Model Franchise Broker Act would create conditions falling under paragraphs (ii) (iii) and (iv) by limiting barriers of entry, limiting competing entities and creating undo licensure and accreditation requirements for franchise brokers. These conditions would deserve greater scrutiny by the FTC as potential violations of the Executive Order.

We urge you to carefully consider the impact of the proposed NASAA Model Franchise Broker Act and its potential impact on our industry and to listen to the voices of those most directly affected by these measures, and not simply the loudest voices in the room.

Respectfully,



Wayne Angel

Owner & Franchise Consultant
Franchise Angels, LLC

FRANCHISE ANGELS™

www.franchiseangelsllc.com

www.linkedin.com/in/wayne-angel

Cell: 770.335.3141

Schedule a quick call

<https://meetings.hubspot.com/wayne-angel>



CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.