

**From:** [Nathan Nitchals](#)  
**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 6:20:24 PM

---

Dear Project Group,

I had the privilege of serving as an officer in the United States Air Force, where “Integrity First” wasn’t just a phrase — it’s a principle I’ve carried throughout my career. After the military, I spent years in oil and gas with small, medium, and large service companies. I also held a Series 7 and 66 license and worked as a registered investment advisor.

About two and a half years ago, I began learning more about franchising. I joined the Franchise Brokers Association, completed their training, always learning new things, and am part of a strong team of consultants that meet twice a week to learn from franchisors and from each other. While still working in oil and gas, I started helping clients explore franchise opportunities, and over time I found the work deeply rewarding. It’s also a lot of work to do a thorough job — but the effort is worth it when you see people take confident steps toward business ownership.

Pretty recently, with another downturn in oil and gas, I made the decision to move into franchise consulting full time. I’ve had the privilege of placing candidates in health and wellness, senior care, home services, and other industries — guiding people from all walks of life toward models where they can lean on proven systems and support. At 45 years of age, I am more convinced than ever that we need more small businesses, not fewer — and franchising, when done right, offers one of the best platforms to help people succeed in business ownership.

That’s why I’m concerned about the unintended consequences of the proposed Franchise Broker Registration Acts. Additional state-by-state paperwork and costs would place unnecessary burdens on consultants like me who provide honest, educated advice. If compliance costs eliminate many service providers, prospective franchisees will lose access to professional guidance and may instead turn to less qualified sources — the very opposite of what regulation should encourage.

A single national license could make sense. But broad state-by-state registration is like adding tolls on every road — redundant, costly, and it doesn’t improve the quality of service delivered. Franchise consulting is not like real estate, where a professional is tied to one community. Our value comes from offering choices nationwide and helping people match with the right opportunity.

I would encourage NASAA to work with industry stakeholders to address specific problematic practices rather than adopting broad registration requirements that would disrupt legitimate business relationships and limit opportunities for small business creation.

Thank you for your time and thoughtful consideration.

Best Regards,

Nathan Nitchals  
Franchise Consultant - MBA  
[nathan@beaconfranchisebrokers.com](mailto:nathan@beaconfranchisebrokers.com)  
(918) 856-1091



**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.