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To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act
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Subject: NASAA Model Franchise Broker Act

Dear Project Group,

I am writing to share my deep concerns about the proposed NASAA Model Franchise Broker Registration Act. As someone who has spent the last 11 years passionately helping people find their perfect franchise match, I feel compelled to speak up about how this legislation could devastate small businesses like mine and the families we serve.

Why This Work Matters to Me

Over the years, I've had the privilege of working with countless individuals who came to me completely overwhelmed by their franchise options. I remember one client who was a recent retiree, unsure of his next chapter, and another who was a working mother looking for a business that would fit her family's schedule. These aren't just transactions to me—they're life-changing decisions that affect real families and their futures.

The matching process I provide isn't just valuable; it's essential. My colleagues and I have invested heavily in training that goes far beyond what you'll find elsewhere in the industry. We genuinely care about creating win-win situations: helping franchisors find dedicated, qualified franchisees who will succeed in their systems, while ensuring our clients conduct thorough due diligence to find opportunities that truly align with their goals, skills, and lifestyles.

My Concerns About This Legislation

The proposed registration requirements would create a heavy administrative burden for small operators like me. Frankly, the compliance costs alone could put me out of business—and I'm not alone in this fear. When small brokers like us disappear, who will help the everyday person navigate this complex industry? The big firms certainly aren't going to serve the individual looking to invest their life savings in their first franchise.

The definition of "franchise broker" is so broad it would sweep up anyone who simply shares information or makes a referral. This seems to miss the point entirely of what we actually do as professional brokers.

The 5-year record retention requirement is too long. Most of us follow standard business practices and IRS guidelines of 3 years. This feels like regulation for regulation's sake, adding unnecessary burden without meaningful benefit.

A Personal Request

After 11 years, I've never had a complaint. In fact, my clients are always grateful and send me their friends and family members. I'm asking you to please reconsider this legislation. Don't let well-meaning regulations destroy the very support system that helps everyday Americans navigate one of the biggest decisions of their lives.

I'd welcome the opportunity to discuss this further if it would be helpful. Thank you for taking the time to consider my perspective.

Warmest regards,

Amanda Vargas

Franchise Broker with the Franchise Brokers Association

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