

From: [Adrienne Leigh](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act
Date: Wednesday, August 27, 2025 5:45:36 PM

Dear Project Group,

I have been a franchise broker for 22 years. I have been with multiple franchise groups over the years including FranNet, Murphy Business & Financial (business brokerage as well as franchise brokerage), IFPG and the FBA. In those 22 years I am proud to have helped thousands of people explore opportunities in franchise ownership and hundreds to become franchisees. As a former career consultant I am also proud to say that I have helped far more determine that franchising is not for them or that this is not the right time than those that have actually moved forward to become franchisees. Franchising is a great opportunity for some people but it is not right for everyone and I consider my role to help people make a solid determination of what is right for them and for their families – not to “sell franchises.”

For those who do become franchisees, the comments I hear are typically along the lines of what I get from candidates such as Stanley (& Monica) Czyzyk who wrote a Google review stating:

“Adrienne was wonderful from start to finish. As first time franchisees, she took the time to educate. She also made the whole process structured, making us very confident we landed on the right concept and have the potential for future success. Success Franchising is more than a broker, they truly are a trusted advisor in the process.”

And from Barry LaCoste, I received the following:

“I highly recommend Adrienne Leigh as a franchise broker to anyone considering business ownership. Adrienne did a fantastic job guiding me through the franchise process. During a free training session she first opened my eyes to the possibility of franchise ownership. Her proven methods and knowledge made the process easy to understand and navigate. From the first steps of identifying my business model, to finding franchises (businesses) that fit my wants and needs that I never would have found on my own, to providing resources for funding, legal, expert guidance, advice, territory information, and education; Adrienne has been with me every step of the way. She not only connected me with excellent resources during my search, but also answered all my questions and concerns. She continues to be available for questions and information even after I’ve signed the franchise agreement and have begun to start the business.”

The point here is: I, like most franchise brokers, help people explore opportunities they might never have found on their own. I provide a step-by-step process that gives them the information they need to make an informed decision. Most candidates start by looking only at brands they’ve heard of or industries they think are “hot”—but that’s rarely the best way to find a business that truly fits their skills, interests, and goals. Through my discovery process, I guide them to uncover franchises that are the *right* fit, not just the obvious ones.

I am concerned about the Franchise Broker Registration Acts because:

1. The Definitions are Overly Broad

The Act's definition of "franchise broker" is far too broad. True franchise brokers like myself play a very different role from internal franchise reps—who are essentially salespeople—and from Franchise Sales Organizations (FSOs). Lumping all three together under one label and applying the same regulations is like treating nurses, physician assistants, and doctors as identical and subjecting them to the same rules.

2. Excessive Regulatory Burden

Most franchise brokers are solo practitioners or have very small teams. The proposed registration requirements would create an overwhelming administrative burden, with compliance costs that could drive many of us out of business—ultimately (ironically) depriving aspiring franchisees of the trusted guidance and support they need to make safe, well-informed decisions.

3. Operational Challenges

The proposed 5-year record retention requirement goes well beyond normal business standards and IRS guidelines. Most businesses retain records for only 3 years, making the mandate both excessive and impractical.

4. Disclosure Confusion

The requirement for multiple disclosure documents is likely to create unnecessary complexity for prospective franchisees without adding meaningful value. The scope of these disclosures exceeds that required of other licensed professionals such as financial planners, investment advisors, and stock brokers. Additionally, the franchise industry is already subject to comprehensive disclosure obligations under existing FTC regulations, which address the core objectives of transparency and informed decision-making.

I fully support raising professional standards in franchise brokerage. We're guiding people through what may be one of the biggest investments of their lives, and there should be requirements for those offering that guidance. But the solution must actually improve candidate safety—not just add bureaucracy and administrative hurdles. As written, the proposed requirements are like trying to solve a neighborhood burglary problem by forcing everyone to paint their house blue: it doesn't deter crime, but it does waste time and money.

Alternative Approaches

Quality professional services typically result from education, ethical standards, and accountability - all worthy regulatory objectives.

With that in mind, a more effective approach might include:

- National standardized education requirements focused on professional competency
- Recognition of existing professional and ethical standards in the industry
- National Licensing or Universal License Recognition (ULR) recognizing out-of-state

professional licenses based on the applicant's completed training or testing requirements.

I would be happy to speak with any of you or provide additional feedback or context -- please feel free to reach out! I thank you for considering the service quality perspective in this regulatory development process.

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To your success!



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