

From: [Greg McCartney](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act
Date: Wednesday, August 27, 2025 6:09:14 PM

Dear NASAA Officials:

I am writing to express my strong opposition to the proposed NASAA Model Franchise Broker Registration Act. As a franchise broker in the industry for four years, as well as seven years of experience as a franchisee prior to becoming a broker, I am deeply concerned about the unintended consequences this legislation would have on my business and the industry as a whole.

I have been profoundly and positively impacted by the opportunities franchising has provided me. Like many of my candidates, franchising was my path to first-time business ownership as a way to achieve more personal and financial freedom. I worked with a franchise broker that was a critical resource to make my dream a reality. Now as a broker myself I strive to provide the same value to my candidates as they use franchising to make significant change for themselves and their communities.

I am concerned that the proposed registration requirements per state would create an overwhelming administrative burden for franchise brokers like myself. The compliance costs alone could force many of us brokers out of business, ultimately reducing the resources available to help prospective franchisees navigate their options.

My suggested solution is that the registration and training requirements proposed should be considered on a national level, thus achieving the same objective without unnecessary and excessive regulatory burden. Automatic reciprocity between states can be a requirement of the Act, as this is not a localized business. The reciprocity would be for registration and educational requirements.

I urge you to reconsider this legislation or significantly modify its scope to avoid harming the small businesses that provide valuable services to the franchise community.

Respectfully,



Greg McCartney
Franchise Broker, Advantage Franchise Brokers

[775-307-4161](tel:775-307-4161)

www.advantagefranchisebrokers.com/

greg@advantagefranchisebrokers.com



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