

From: [Bill Blackmon](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act Comments
Date: Wednesday, August 27, 2025 7:25:12 PM

Ladies and Gentlemen,

For the past 25 years, as a consultant with FranChoice....I have enjoyed helping others discover the fabulous world of franchising. The franchise business model has been exceptional for myself and for my family. In my career I have sold products to franchise brands, worked as senior executive in franchising and owned 4 different franchise business models.

As a franchise consultant here at FranChoice...I/we are not involved in the sales process. We provide qualified prospects to franchise brands that match the franchise brands requirements. Our objective is to provide the prospect options to compare and contrast. The search model which is developed and approved by the prospect is focused on their background. The search is based on their goals established from the very start of our process. As a lead source for franchise companies, just like internet advertising sites such as the IFA or Entrepreneur.com, or social media sites like Facebook and LinkedIn, or many other examples, we should not be covered in this purposed definition of franchise sellers because that's not what we do. The confusing language in this regulation, designed to label as a broker anyone who is "indirectly" involved in the franchise sales process needs to be changed or the unintended consequences will be significant, costly and unnecessary. While regulations can be helpful to the consumer...the proposed regulation is unnecessary, burdensome, costly and duplicates rules and regulations already in place. Advocating for individual states to create their own rules and fees related to the disclosure process creates enormous hardship from a compliance standpoint. In my opinion...the FTC, on a national basis, should evaluate if additional regulations need to be established. States now face difficult budget compliance and asking them to create massive staffs to manage this process is not what the current administration set out as a plan across all industries. Thank you for taking the time to read my thoughts and concerns.

Respectfully

Bill Blackmon

Bill Blackmon

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To book a time with Bill.

<https://calendly.com/bblackmon>



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