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**Subject:** [EXTERNAL]NASAA Model Franchise Broker Act Comments  
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My name is Jim Judy. I've been in the franchise industry for 26 years and have been a Franchise Consultant for the last 23 years.

Here are three important issues I'd like to draw your attention to for review:

- Franchise and its consultants are a lead source for franchise companies. We are not involved in the franchise sales process. The leads we identify are sent to the prospective franchises and taken through a sales process by the franchise sales staff. Franchise should not be covered in the definition of "franchise sellers" because that is not what we do. We are a lead source similar to internet advertising, like IFA or Entrepreneur.com or any social media site like Facebook or LinkedIn. The language in this regulation needs to be changed, as it's confusing to label as a broker anyone who is "indirectly" involved in the franchise sales process.
- For those involved in the franchise sales process, the regulation is unnecessary, costly, and a duplication of rules and regulations that are already in place.
- Supporting individual states to create their own rules and fees to this disclosure process unnecessarily creates confusion and compliance adversity. If we need more regulation of franchise sales brokers, it should be implemented by the FTC on a national basis.

Thank you for your consideration,

Jim

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