

**From:** [Stephen Maeker](#)  
**To:** [NASAA Comments](#); [Theresa Leets](#); [bill.beatty@dfi.wa.gov](mailto:bill.beatty@dfi.wa.gov); [Erin Houston](#)  
**Cc:** [Jeff Elgin](#)  
**Subject:** [EXTERNAL]NASAA Model Franchise Broker Act Comments  
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To Whom It May Concern:

My name is Stephen Maeker, I have been a Franchise Consultant since January 2012. My extensive director/senior director corporate level experience includes franchising with Papa Murphy's Take and Bake Pizza, TGIFriday's, Mobil Oil and Jack in the Box.

As a Franchise Consultant, I am **not** directly involved in the franchise sales process, I simply generate leads for franchise companies in Franchise's inventory. The sales process is driven by the franchise sales staff whether they are internal employees or IC's like FSO's. I (we) should not be covered in the definition of franchise sellers because that is not my (our) role. This language is confusing and needs to be changed.

Furthermore, as for folks who are directly involved in the franchise sales process, this new regulation is **unnecessary and costly**, duplicating rules already in place.

Finally, advocating for individual states to create their own rules/fees related to the disclosure process creates unnecessary confusion and hardship with compliance. If more regulation of franchise sales brokers is needed, it should be done by the **FTC** on a **national** basis.

Respectfully,

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