

From: [Diane Pleuss](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Cc: [Jeff Elgin](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act Comments
Date: Wednesday, August 27, 2025 4:16:25 PM

Hello,

I began my career in franchising in 1994 and have been a franchise consultant with FranChoice for 20+ years.

There are three main issues I would like to address.

1. Please note that as a consultant, neither I nor FranChoice is involved in the franchise sales process. We are a lead source for franchise companies. We send them candidates as prospective franchisees. It's the franchise sales staff, either internal employees or independent contractors like Franchise Sales Organizations (FSO's), that take them through the sales process. As a lead source for franchise companies, similar to internet advertising websites such as IFA, Entrepreneur.com, or social media sites like LinkedIn or Facebook, or other similar companies, we should not be included in this definition of franchise sellers because that's not our primary focus. 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.
2. As for people who are actually involved in the franchise sales process, this new regulation is unnecessary, burdensome, costly and duplicates rules and regulations already in place.
3. Rather than broad registration requirements, the industry would be better served by enforcement of existing laws against fraud and misrepresentation, along with education initiatives for prospective franchisees.

Best regards,
Diane

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"Success requires three bones – wishbone, backbone and funnybone." Kobi Yamada

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