

From: [Giuseppe Grammatico](#)
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 4:08:58 PM

Good afternoon,

My name is Giuseppe Grammatico, and I have been in the franchise business since 2007. I appreciate the opportunity to provide comments on the proposed regulation regarding franchise brokers.

There are three main issues I would like to highlight:

- 1. FranChoice and its consultants are not part of the franchise sales process.**
We serve solely as a lead source for franchise companies. Once we provide a lead, the franchisor's own sales staff or contractors (e.g., FSOs) take the prospective franchisee through their sales process. Just like advertising platforms such as the IFA, Entrepreneur.com, Facebook, or LinkedIn, our role ends with lead generation. For this reason, the current language that categorizes anyone "indirectly" involved as a broker is overly broad and creates unintended consequences.
- 2. The regulation is unnecessary, duplicative, and burdensome for those directly involved in franchise sales.**
Existing federal and state regulations already govern franchise sales conduct. Adding new layers of regulation increases costs without meaningful consumer protection benefits.
- 3. State-by-state regulation would create significant compliance challenges.**
Allowing individual states to impose their own rules and fees will result in unnecessary confusion and administrative hardship. If further regulation is deemed necessary, it should be managed by the FTC on a national level to ensure clarity and consistency.

In summary, while I support efforts to protect franchise candidates, this regulation—if applied as written—will create confusion, unnecessary compliance burdens, and unintended harm to legitimate operators who are not engaged in franchise sales.

Thank you for considering these comments.

Sincerely,
Giuseppe Grammatico

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