

From: [Conor Godfrey](#)
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 3:03:53 PM
Attachments: [image001.png](#)
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[image002.png](#)

To whom it may concern,

My name is Conor Godfrey and I'm writing to you to express my opinion on the proposed NASAA Model Franchise Broker Act.

Firstly, I'd like to begin by letting you know a little about me. I've been a franchise consultant with FranChoice for the past 5 years. Prior to joining FranChoice I spent nearly two decades on Wall Street. I'm a married father of three young girls, and I'm proud to say that the opportunity with FranChoice has allowed me not only to support my family, but also to be a present father and husband, in contrast to my prior life in banking. Most importantly, this opportunity has allowed me to positively impact the lives of others by helping educate aspiring entrepreneurs on the ins and out of the franchise world.

The issues I would specifically like to touch on in today's email follow below:

FranChoice consultants are not involved in the franchise sales process – we are a lead source for franchise companies. We send them leads for prospective franchisees, which are then taken through a sales process by the franchise sales staff (whether internal employees or independent contractors like FSOs). 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 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 need to be changed or the unintended consequences will be significant.

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.

Advocating for individual states to create their own rules and fees related to this disclosure process unnecessarily creates confusion and hardship from a compliance

standpoint. If we need more regulation of franchise sales brokers, it should be done by the FTC on a national basis.

Thank you for allowing me the opportunity for commentary. We appreciate your time and attention to this matter.

Sincerely,
Conor Godfrey



CONOR GODFREY

Principal Consultant & Founder

Trinity Advisory powered by FranChoice
cgodfrey@franchise.com | (203) 233-1540
www.trinityadvisory3.com

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