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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 3:17:22 PM

Good afternoon!

My name is Melissa Lewis, I've been in the franchise industry since 2001, working for a franchisor, as a franchisee, and as a franchise consultant for over 21 years.

I am very passionate about the franchise industry and helping people achieve their dreams, which is why I became a franchise consultant over 20 years ago.

The three main issues we want to touch on in the comments are:

1. FranChoice and its 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 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. 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.

Best regards,
Melissa Lewis

Dream BIG!

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Curious about my franchise trends for 2025? <https://youtu.be/cNQaCK5PoS4?si=9KPSE2JbyEE8z959>

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