

From: [Dan Lorenz](#)
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 3:15:06 PM
Attachments: [image.png](#)

To Whom It May Concern,

My name is Dan Lorenz and I serve as a franchise consultant with FranChoice. I have owned franchises myself and now spend my career helping others explore whether business ownership is the right path for them. The short version is that I have seen firsthand the impact good guidance can make for people considering such a major life decision.

I want to share my concerns about the proposed regulation redefining “franchise brokers.” The way this rule is currently written creates significant problems for both professionals like me and the prospective franchisees we serve.

First, the definition is far too broad. FranChoice does not sell franchises. We act as a lead source, connecting individuals who are interested in franchising with companies that may be a good match. From there, the franchisor’s own sales team or independent contractors manage the actual sales process. Grouping lead generation and referral services into the same category as active franchise sellers is like saying someone who introduces you to a realtor should be regulated as if they are selling houses. The intent may be good, but the language creates unintended consequences that capture people who are not truly involved in sales.

Second, the regulation is unnecessary and duplicative. Rules already exist at both the state and federal levels to address legitimate concerns about broker conduct. Adding another layer of compliance would increase costs, create administrative headaches, and make it harder for smaller operators to continue providing value. The irony is that these new burdens would reduce the resources available to support prospective franchisees, while doing little to stop bad actors who are already ignoring the rules in place.

Third, allowing states to create their own registration and disclosure requirements adds confusion rather than clarity. Franchising is inherently a multi-state business, and asking consultants and franchisors to juggle fifty different versions of the same rule will only create chaos. If additional oversight is truly necessary, it should be implemented and enforced by the FTC on a consistent national basis.

At the end of the day, I believe we all share the same goal: protecting prospective franchisees. The better path forward is enforcing the laws we already have, focusing on fraud and misrepresentation where they exist, and ensuring candidates have access to quality education and transparent information. That is how we empower people to make confident decisions, without unintentionally strangling the very support systems they rely on.

Thank you for your consideration.

Be the Buffalo,
Dan Lorenz



Daniel Lorenz

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