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Cc: [Jeff Elgin](#); [Allison Zorich](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Act Comments
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Attachments: [image.png](#)
Importance: High

Hello, I am a 15-year franchising veteran and have been involved in most aspects of franchising including franchise funding; leading the development for 8 service-based franchise brands; launching a new brand in the fitness space; overseeing the growth and expansion across a dozen brands as a franchise sales organization and now as a franchise consultant.

FranChoice and its Consultants are not involved in selling franchises, we simply act as a lead source, similar to advertising platforms like the IFA, Entrepreneur.com, Facebook, or LinkedIn. The actual sales process is conducted by franchisor staff or contractors, not us. Including lead generators like FranChoice in the definition of “franchise sellers” misrepresents our role and could create significant unintended consequences.

For those directly engaged in the franchise sales process, this regulation is redundant, burdensome, and costly, adding layers of oversight that simply duplicate existing rules already in place.

Fragmenting disclosure requirements across individual states creates needless compliance burdens. Any added regulation of franchise sales brokers should come from the FTC to ensure clarity and consistency nationwide.

Thank you for your time.

Allison Zorich

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