

From: [Theresa Los](#)
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 3:21:49 PM

To all concerned parties:

My name is Theresa Los and I have been affiliated with FranChoice as a Franchise Consultant for 23 years. Prior to FranChoice, I worked for over 10 years with three other franchise organizations; one in conversion sales, one as an Area Developer, and one in franchisee support.

I would like to comment on the regulations of the disclosure process proposed by NASAA: My experience with FranChoice is unique that I am not involved in any sales process, or support of the candidates that become franchisees. We, instead, are a lead source for franchise companies. We send Franchisors 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.

As for people who are actually involved in the franchise sales process, this new regulation is unnecessary, costly and duplicates rules and regulations already in place. The proposal would create an overwhelming administrative burden for small operators like myself. The compliance costs alone could force me and others, out of business, ultimately reducing the resources available to help prospective franchisees navigate their options.

The registration requirements are also extremely impractical for an industry where we often work with multiple brands across multiple states. 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. Current state and federal regulations already address the legitimate concerns raised about broker conduct. Additional layers of regulation only create a burden to do business.

Thank you for your attention to this matter.

Sincerely,

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If we are ever going to enjoy life, now is the time, not tomorrow or next year...Today should always be our most wonderful day.

Thomas Dreier

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