

From: [Kim Daly](#)
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 3:36:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

To whom it may concern,

My name is Kim Daly, and I have been a franchise consultant with FranChoice for over 23 years. I love this industry and what it has afforded me, and that makes me very passionate about helping others achieve their dreams through franchising.

With regard to your proposed plans for regulations and how this would impact me as a FranChoice consultant and our industry as a whole, I have some thoughts that I'd like to share:

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.**

Thank you for your consideration.

Kim Daly

Kimberley J. Daly
Chief Mindset Officer & Franchise Consultant

☎ [603.964.2910](tel:603.964.2910)

🌐 www.TheDalyCoach.com

✉ kim@thedalycoach.com



 www.TheZeeSuite.com



CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.