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To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NASAA Model Franchise Broker Registration Act
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Dear NASAA Officials,

I'm reaching out as a small-time franchise broker who's been in the game as a franchisee and small business acquisitions specialist for years, helping folks find the right franchise fit so they can have a profitable and sustainable business in the communities that need viable businesses. I've got some serious concerns about the proposed NASAA Model Franchise Broker Registration Act. Look, I get the need for oversight, but this bill feels like it's swinging a sledgehammer when a nudge would do. Let me break down why this could do more harm than good.

This Thing's a Paperwork Nightmare The registration requirements you're proposing? They're a beast. For small operators like me, the time and money it'll take to comply could straight-up sink us. We're not big corporations with legal teams on speed dial. These costs could push folks like me out of business, which means fewer people helping franchisees find their way. Less choice, less support—not exactly a win for the industry.

The “Franchise Broker” Label Is Way Too Broad Your definition of “franchise broker” is so wide it's catching people who don't belong in this net. We're talking about folks who just make introductions or share basic info—not people closing deals or steering sales. Requiring every referrer or consultant to register is overkill. It's like asking every barista to get a food safety license because they handed someone a muffin.

Five Years of Records? Really? The 5-year record retention rule is a head-scratcher. Most businesses, including the IRS, stick to 3 years. Asking us to keep records for 5 feels like piling on for no good reason. It's not just impractical—it's a storage and management headache that doesn't add value for anyone.

I'm all for protecting franchisees, but this bill needs a serious rethink. Narrow the scope, cut the red tape, and let small businesses like mine keep doing what we do best: connecting people with opportunities. I'd love to see a version of this that works for everyone without crushing the little guy.

Thanks for hearing me out,

Robyn Deering

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