

From: [Rick Morgin](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]NSAA Franchise Broker Legislation
Date: Wednesday, August 27, 2025 1:28:16 PM

Dear Legislative group,

I'm Rick Morgin and I've been a consultant in franchising for 10 years. I've gained some knowledge about the legislation intended to regulate the activities of Franchise consultants/brokers in California and other states.

Your legislation will make it improbable and impossible to further entrepreneurship in my home state through the franchise model. I cannot see how I can operate if in California I have to re-register and pay a fee with each type of disclosure. It will be cost prohibitive to work with people who want to explore and determine if the franchise model is right for them.

By putting up these barriers I view your actions and intent as anti-competitive. Your intent is to eliminate the growth of the franchise sector from the great state of California. I also feel that by inhibiting a specific sector of small business growth you are prejudiced against the franchise model.

You have seen the year over year growth statistics published by the IFA. I interpret your constriction of the franchise model as being anti-entrepreneurial and therefore anti-American!

You seem to have little understanding of the role of the franchise broker/consultant. We have no control or authority in the Franchisors awarding process and the acceptance of the award by the Franchisee. I provide an education and coaching process for my clients that connects them to the Franchisors they show interest. I have no control over the sales/awarding whatever you want to call it.

How will you sleep at night knowing that you have taken an anti-competitive, anti-entrepreneurship, and anti-American position?

Sincerely,

Rick Morgin

Consultant / The Franchise Consulting Company

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Schedule a 15 Minute Call: <https://calendly.com/rick-132>



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