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**To:** [Erin Houston](#); [Theresa Leets](#); [NASAA Comments](#); [bill.beatty@dfi.wa.gov](mailto:bill.beatty@dfi.wa.gov); [Registrations@sos.ga.gov](mailto:Registrations@sos.ga.gov)  
**Subject:** [EXTERNAL]Re: Proposed NASAA Model Franchise Broker Registration Act - Impact  
**Date:** Wednesday, August 27, 2025 3:37:56 PM

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Dear NASAA Officials,

Re: Proposed NASAA Model Franchise Broker Registration Act

I am writing to respectfully express my deep concern and strong opposition to the proposed Model Franchise Broker Registration Act.

As a franchise broker and small business owner with over 25 years of experience assisting prospective franchisees in identifying and evaluating business opportunities, I am troubled by the potential impact this legislation could have on both my livelihood and the broader franchise industry.

I have helped to open over **300+ small businesses** around the Country, employing **1,000's of workers**, and generating over \$150,000,000 in annual revenue for the economy.

#### Diminished Resources

The proposed regulations risk driving experienced brokers out of the market, thereby eliminating a critical resource for individuals seeking guidance in the complex process of franchise ownership. Brokers play a vital role in helping prospective franchisees conduct due diligence and make informed decisions.

#### Restricted Access to Emerging Concepts

Franchise consultants frequently introduce clients to innovative, early-stage franchise concepts that may otherwise remain undiscovered. Curtailing the role of these intermediaries would limit consumer choice and stifle the growth of new franchise models across the country.

#### Addressing the Core Issues

Rather than imposing broad registration requirements, regulatory efforts would be better directed toward curbing specific harmful practices such as misrepresentation or fraud—issues that are already addressed under existing consumer protection laws.

#### Educational Contributions

Franchise brokers often serve as educators, helping individuals understand the

intricacies of franchise ownership and guiding them through the decision-making process. Removing this support structure would leave many prospective franchisees without the benefit of experienced counsel.

I respectfully urge NASAA to reconsider this proposal and to engage collaboratively with industry professionals to develop solutions that protect consumers without dismantling the valuable relationships that support them.

Thank you for your time and thoughtful consideration.

Drew Paras

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