

From: [Joe Carter](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]Re: Public Comment on NASAA's Proposed Franchise Broker Act
Date: Wednesday, August 27, 2025 6:30:49 AM

Dear NASAA Project Group,

Let me be candid.

The proposed Franchise Broker Act, as written, risks doing more harm than good. While I respect the intent behind it, this framework—if adopted—will actively undermine the entrepreneurship and job creation our states and country depend on.

Here's the catch:

This proposal runs counter to the federal Executive Order aimed at reducing anti-competitive regulatory barriers. It conflates roles, burdens emerging players with duplicative compliance, and empowers politically connected interests over economic mobility.

I've spent over a decade helping people explore business ownership.

I don't sell franchises. I educate, advise, and introduce candidates to models that match their skill sets and goals. These introductions turn into businesses. Those businesses create jobs, pay taxes, and strengthen local economies.

This isn't just theory—it's measurable impact.

But this legislation?

It creates an uneven playing field and favors entrenched systems. It groups together fundamentally different roles—franchise brokers, FSOs, internal reps—and regulates them as if they're one. They're not.

What's worse:

Many of the most vocal advocates pushing this forward have clear conflicts of interest. This feels less like consumer protection and more like political maneuvering—with real economic consequences.

Let's zoom out:

If the real goal is to grow responsible franchising, create jobs, and protect buyers, we can get there—without destroying the bridge between emerging brands and qualified candidates.

I propose:

- Clarifying definitions so only those with true sales authority are regulated as such.
- Adding simple disclosures to the FDD process—where prospective franchisees already receive structured guidance.
- Offering a national education program—voluntarily and at no cost—to raise the standard without raising barriers.

Franchise brokers are not the problem.

We're part of the solution. We help vet, educate, and guide people through one of the most

serious decisions of their lives. Blocking that access doesn't just hurt brokers—it chokes out the next generation of entrepreneurs.

I urge you to reconsider. The future of small business ownership—and the health of our states' economies—depends on it.

Let's build strategically.

Sincerely,

Joe Carter

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