

**From:** [Matt Sullivan](#)  
**To:** [NASAA Comments](#); [Theresa Leets](#); [bill.beatty@dfi.wa.gov](mailto:bill.beatty@dfi.wa.gov); [Erin Houston](#)  
**Subject:** [EXTERNAL]Subject: Comment on Proposed NASAA Model Franchise Broker Registration Act  
**Date:** Thursday, August 28, 2025 8:33:20 AM

---

Dear NASAA Officials with CC to Congressman Tony Wied

I am writing to express my opposition to the proposed NASAA Model Franchise Broker Registration Act. As a small franchise broker who has been helping prospective franchisees find suitable opportunities for 5 years, I am deeply concerned about the unintended consequences this legislation would have on my business and the industry as a whole.

During the 5 years of operations, I have helped 46 people make the leap into business ownership. My efforts have generated significant economic activity and are a noble pursuit of entrepreneurship and capitalism. In addition, I have been a franchisee for 11 years in Green Bay, WI and owe a great deal of gratitude to the broker who helped me find my franchise. He in, no way, did anything but consult about my needs, educate me about franchise ownership (both pros and cons) and help me make an informed decision across multiple franchises. The franchisor was 100% in charge of facilitating my purchase, not the broker.

I oppose the NASAA Model for 3 primary reasons:

### **Excessive Regulatory Burden Inhibits Free Commerce**

The proposed registration requirements would create an overwhelming administrative burden for small operators like myself. We have very limited budgets and have no guaranteed income or revenue. Thus, additional costs for compliance will inhibit me from staying, and others for joining this industry. Perhaps that is the intention?

### **Overly Broad Definitions**

The definition of "franchise broker" in the Act is far too broad and would capture individuals who simply make referrals or provide information, not those actually engaged in franchise sales and in control of the process. This unfairly holds me, as a broker, liable for activities that I can't control.

### **Operational Challenges**

The 5-year record retention requirement far exceeds standard business practices and IRS requirements. Most businesses retain records for 3 years, making this requirement both excessive and burdensome.

This entire initiative strikes me as driven by an overly large regulatory

body attempting to create overlapping and duplicative regulations that ultimately diminish economic activity.

Respectfully,  
Matt Sullivan  
RightFran LLC  
Matt@RightFran.com



Matt Sullivan  
Owner, RightFran LLC  
(Franchise Search Services)  
920-819-8536  
Matt@RightFran.com  
Green Bay, WI 54304  
[www.RightFran.com](http://www.RightFran.com)  
<https://calendly.com/rightfran>



**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.