

From: [Dave Sullivan](#)
To: [NASAA Comments](#); [Theresa Leets](#); bill.beatty@dfi.wa.gov; [Erin Houston](#)
Subject: [EXTERNAL]Subject: Industry Experience – Comments on NASAA Model Franchise Broker Registration Act
Date: Wednesday, August 27, 2025 3:04:34 PM
Attachments: [badge_FSC.png](#)
[badge_CFB.png](#)

Dear NASAA Regulators,

My name is Dave Sullivan, and I've been working in franchising for over 15 years. In that time, I've had the privilege of helping people become franchise owners. I've seen families change their lives through business ownership, and I've seen emerging brands grow into strong systems thanks to broker introductions. I've also done this with **zero complaints during my career** — something I'm proud of.

That's why I feel compelled to speak up. The proposed Model Franchise Broker Registration Act may be well-intentioned, but in practice it would harm the industry, hurt small businesses, and reduce opportunities for people looking to build something for themselves.

What I See in the Real World

- **Brokers are a benefit, not a risk.** We educate candidates, introduce them to professionals like franchise attorneys and accountants, and help them understand due diligence.
- **Emerging brands need us.** Without brokers, they can't compete with large, established systems, and innovation suffers.
- **Compliance costs are unworkable.** Requiring 50 separate filings, exams, and fees would put many ethical, independent brokers out of business.

A Better Path

Instead of creating duplicative regulation, I urge you to:

1. **Enforce existing laws** on fraud and misrepresentation — they already cover the concerns raised.
2. **Adopt a national education platform** with reciprocity between states. Brokers, networks, and attorneys are ready to help build it.
3. **Target actual misconduct**, rather than lumping together professionals who play very different roles.

Franchising has created millions of jobs and thousands of small businesses. Please don't let overregulation undo the partnerships that make this possible. Protecting consumers is important, but so is protecting their ability to find opportunities, make informed choices, and succeed in business ownership.

Sincerely,
Dave

FCC™

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