

followed by a **7th SEPARATE OPTION** that allows you to choose **THE ISSUES MOST MEANINGFUL TO YOU** with a **Plug-n-Play Format** that allows for you to make your voice heard on the issues you believe to be most important.

1. COPY THE LETTER BELOW AND PASTE IT TO YOUR NOTES APP
2. CHOOSE THE PARAGRAPHS THAT MATTER TO YOU AND PASTE THEM INTO THE PLUG-N-PLAY SECTION OF THE LETTER IN YOUR NOTES APP
3. COMPLETE AREAS HIGHLIGHTED IN **YELLOW**
4. COPY THE COMPLETED LETTER AND PASTE TO THE COMMENT WINDOW AT THE LINK PROVIDED.

Sample "PLUG-N-PLAY FORMAT" Letter to the FTC, Please modify to comport with your beliefs and advocacy intentions:

[Your Name] - OR LEAVE BLANK

[Your Address]

[City, State, ZIP]

[Email Address]

[Date]

Federal Trade Commission Office of the Secretary 600 Pennsylvania Avenue, NW
Washington, DC 20580

Subject: Public Comment - Revision and Overhaul of the FTC Franchise Rule

Dear Commissioners,

I am writing as a concerned franchisee stakeholder to express my strong support for the revision and overhaul of the FTC Franchise Rule. As a franchisee, I have personally experienced the challenges and shortcomings within the franchising industry, and I firmly believe that significant changes are necessary to ensure fair and equitable treatment for all franchisees.

[Insert General Introduction and Statement of Support for Franchisees' Rights]

I would like to highlight several key areas that I believe require immediate attention and inclusion in the revised FTC Franchise Rule. These areas encompass crucial aspects of franchising that directly impact the well-being of franchisees, the economy, and the

overall integrity of the franchise system. I respectfully request that the Federal Trade Commission seriously considers the following:

1 - [INSERT PARAGRAPH FROM BELOW OPTIONS HERE, CHOOSE THOSE YOU FEEL ARE MOST IMPORTANT, OR ADD ALL IF YOU BELIEVE A COMPREHENSIVE OVERHAUL IS NEEDED.] SEE PINK PARAGRAPHS BELOW AND PASTE HERE!

2 - [INSERT PARAGRAPH FROM BELOW OPTIONS HERE, CHOOSE THOSE YOU FEEL ARE MOST IMPORTANT, OR ADD ALL IF YOU BELIEVE A COMPREHENSIVE OVERHAUL IS NEEDED.] SEE PINK PARAGRAPHS BELOW AND PASTE HERE!

3 - [INSERT PARAGRAPH FROM BELOW OPTIONS HERE, CHOOSE THOSE YOU FEEL ARE MOST IMPORTANT, OR ADD ALL IF YOU BELIEVE A COMPREHENSIVE OVERHAUL IS NEEDED.] SEE PINK PARAGRAPHS BELOW AND PASTE HERE!

3 - insert your personal comments and motivations here

In conclusion, I firmly believe that the revision and overhaul of the FTC Franchise Rule is an urgent and necessary step towards creating a fair and transparent franchising environment. By addressing the concerns and implementing the recommendations outlined above, the Federal Trade Commission will play a crucial role in safeguarding the rights of franchisees, promoting healthy competition, and fostering economic growth.

I thank you for considering my comments and for your commitment to protecting the interests of franchisee stakeholders. I am hopeful that the revised FTC Franchise Rule will reflect the necessary changes that will strengthen the franchise system and provide a solid foundation for the success of franchisees across the nation.

Sincerely,

[Your Name]

PLUG-N-PLAY PARAGRAPHS - MAKE YOUR VOICE HEARD!!!

Motivated by Cases Involving Unleashed Brands: I have been particularly motivated to support the revision of the Franchise Rule due to recent cases involving Unleashed Brands and their franchisees. Reports of retaliation, unethical conduct, aggressive legal tactics, and questionable practices have raised serious concerns about the protections currently afforded to franchisees. The cases of the Premier Martial Arts franchisee, Tiffany Cianci and Patricia Naylor have been particularly concerning. These situations highlight how some franchisors exercise aggressive tactics to instill fear and harassment, and may use unethical legal strategies to shield themselves from accountability, thereby undermining the free market and harming small business owners. It is imperative that the FTC addresses these issues to prevent such conduct from continuing unchecked and to ensure a fair and transparent franchising environment for all stakeholders. I also support opening an investigation into the unlawful conduct of Unleashed Brands.

Protecting Franchisee Rights: It is crucial for the revised FTC Franchise Rule to include provisions that explicitly protect the rights of franchisees. These protections should ensure fair treatment, non-retaliation, and the ability to voice concerns without fear of retribution. Franchisees deserve a level playing field and the confidence that their investments and livelihoods are safeguarded.

Enhanced Franchise Disclosure Requirements: Transparency is vital for informed decision-making. The FTC should strengthen the franchise disclosure requirements, ensuring that potential franchisees have access to comprehensive and accurate information about the franchisor, the business model, financial performance representations, and any involvement of private equity firms. Clear and complete disclosures will empower individuals to make sound investment choices.

Fair Franchise Renewal Practices: Franchisees often face challenges when it comes to renewing their franchise agreements. Unreasonable renewal terms and excessive

fees can hinder franchisees' ability to continue operating their businesses. The FTC should address these concerns by establishing guidelines that promote fairness and transparency in the franchise renewal process, protecting franchisees' rights to renewal under reasonable and equitable conditions.

Reforming Overly Broad Non-Compete Provisions: The current overly broad and weaponized non-compete provisions severely limit healthy competition in the marketplace, causing harm to consumers and the economy. The FTC should intervene by imposing restrictions on the scope and duration of non-compete clauses, ensuring they are reasonable and do not unduly restrict franchisees' ability to engage in fair competition after the termination of their franchise agreements.

Support for a Private Right of Action: To strengthen enforcement and ensure accountability, it is crucial to include a private right of action provision in the revised FTC Franchise Rule. This provision would empower franchisees to seek legal remedies in court for violations of the rule, allowing them to pursue appropriate damages, injunctive relief, and other necessary remedies.

Prohibiting Retaliation Against Franchisee Association Participation: Franchisee associations play a vital role in protecting the interests of franchisees. The revised FTC Franchise Rule should explicitly prohibit franchisors from retaliating against franchisees who participate in such associations, ensuring that franchisees can engage in collective action without fear of reprisal.

Allowing Transfer of Territories to Qualified Heirs: The FTC should support a rule that allows franchisees to pass their territories to qualified heirs in the event of their deaths. This provision would protect the legacy of franchisees, providing stability and continuity for their businesses while preserving opportunities for future entrepreneurs.

Prohibiting Unilateral Changes to Business Models: Franchisors should not have the unilateral power to change the fundamental business model without meaningful renegotiation of contract terms. The FTC should establish a rule that prohibits franchisors from making unilateral changes that materially impact franchisees' business operations without their consent and the opportunity for fair negotiation.

Barring Non-Negotiable Agreements in Franchise Acquisition Process: The acquisition of a franchise is a significant investment, and franchisees should have the ability to negotiate the terms and conditions of their agreements. The FTC should prohibit franchisors from presenting non-negotiable agreements during the franchise acquisition process, ensuring that franchisees have a fair opportunity to establish mutually beneficial contractual terms.