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May 5, 2026

Ms. Rebecca Brubaker
Commerce Analyst II
Minnesota Department of Commerce
85 – 7th Place East, Suite 280
St. Paul, MN 55101-2198

VIA ELECTRONIC FILING

Re: Response to Comment Letter for:
Elements Therapeutic Massage, LLC
File No. 5517

Dear Ms. Brubaker:

In response to your comment letter dated May 5, 2026, we have made the requested change and have submitted the changed page electronically.

If you have any questions or comments, please feel free to contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Elizabeth S. Dillon". The signature is written in a cursive, flowing style.

Elizabeth S. Dillon

ESD/mdr
Attachments

FRANCHISE DISCLOSURE DOCUMENT



ELEMENTS THERAPEUTIC MASSAGE, LLC
(a Delaware limited liability company)
1890 Wynkoop Street, Unit 1
Denver, Colorado 80202
(303) 663-0880
www.elementsfranchise.com
info@elementsmassage.com

Elements Therapeutic Massage, LLC, offers franchises for the operation of studios under the name “Elements Massage” offering various forms of therapeutic massage services, certain skincare services, and any related future services and products.

The estimated investment necessary to begin operation of an Elements Massage studio ranges from \$567,239 to ~~\$1,057,853~~ \$1,097,853 if you are opening a Traditional Studio and from \$524,989 to \$711,523 if you are opening a Value-Engineering Studio. This includes \$89,774 to \$102,324 that must be paid to the franchisor or its affiliate(s).

The estimated initial investment necessary to develop two or more Studios under our form of Area Development Agreement depends on the number of franchises that we grant you the right to open. By way of example, the estimated initial investment associated with acquiring the right to develop three Studios pursuant to an Area Development Agreement and necessary to begin operations of the first of those Studios ranges from \$602,239 to \$1,132,853 if you are opening a Traditional Studio and from \$559,989 to \$746,523 if you are opening a Value Engineering Studio, which includes: (a) a Development Fee amounting to \$75,000 payable to us upon signing, and (b) the initial investment to begin operations of the initial franchised Studio you are required to development within your Development Area.

This disclosure document summarizes certain provisions of your franchise agreement and other information in plain English. Read this disclosure document and all accompanying agreements carefully. You must receive this disclosure document at least 14 calendar-days before you sign a binding agreement with, or make any payment to, the franchisor or an affiliate in connection with the proposed franchise sale. **Note, however, that no governmental agency has verified the information contained in this document.**

You may wish to receive your disclosure document in another format that is more convenient for you. To discuss the availability of disclosures in different formats, contact Elements Therapeutic Massage, LLC’s Legal Department at 1890 Wynkoop Street, Unit 1, Denver, Colorado 80202, (303) 663-0880.

The terms of your contract will govern your franchise relationship. Don’t rely on the disclosure document alone to understand your contract. Read all of your contract carefully. Show your contract and this disclosure document to an advisor, like a lawyer or an accountant.

Buying a franchise is a complex investment. The information in this Disclosure Document can help you make up your mind. More information on franchising, such as “A Consumer’s Guide to