



Drummlaw

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March 20, 2019

Ms. Flora Angui
Commerce Analyst
Securities Registration and Enforcement Section
Minnesota Department of Commerce
85th 7th Place East, Suite 500
St. Paul, MN 55101

Re: Comment Letter Response Core Progression Franchise, LLC; File No: F-8830

Dear Ms. Angui:

We are in receipt of your comment letter regarding Core Progression Franchise, LLC (“Franchisor”) dated March 4, 2019. We have addressed your correspondence as noted below:

1. A corrected Costs and Source of Funds document is included with this response.
2. We have corrected the high end investment total, as requested.
3. We have added the risk factor to the State Cover Page, as requested.
4. We have revised Item 11 and Item 12 regarding the site selection process for Multi-Unit franchises, as requested.
5. We have corrected the table of contents of the Franchise Agreement, as requested.

We have enclosed the marked pages of the FDD reflecting the requested revisions. Please note the marked pages will also show revisions requested by other states. If you have any questions or comments, please contact the undersigned. Thank you, in advance, for your assistance.

Sincerely,

Drumm Law, LLC



H. Michael Drumm

FRANCHISOR'S COSTS AND SOURCE OF FUNDS

1. Disclose the Franchisor's total costs for performing its pre-opening obligations to provide goods or services in connection with establishing each franchised business, including real estate, improvements, equipment, inventory, training, and other items stated in the offering:

Category	Costs
Real Estate	<u>\$0</u>
Improvements	<u>\$0</u>
Equipment	<u>\$0</u>
Inventory	<u>\$0</u>
Training	<u>\$10,000</u>
Travel	<u>\$3000</u>
Meals	<u>\$400</u>
Other (describe)	<u>\$0</u>
Totals	<u>\$13,400.00</u>

2. State separately the source of all required funds:

Initial Franchise Fees and Working Capital.

FRANCHISE DISCLOSURE DOCUMENT



Core Progression Franchise LLC
a Colorado limited liability company
10693 Melody Drive
Northglenn, Colorado 80234
Phone: 303-484-1170
Email: info@coreprogression.com
Website: www.coreprogression.com
www.coreprogressionfranchise.com

Core Progression businesses provide membership-based training and group fitness classes and related products and services (“Core Progression Business(es)”).

The total investment necessary to begin operation of a Core Progression ~~franchise~~ ranges from franchised business is \$152,990 to \$535,408,630, including. This includes \$47,750 to \$48,850 which that must be paid to the franchisor or its affiliates. The total investment necessary to begin operation of at two Core Progression ~~Business with two (2) franchises~~ franchised businesses under a Multi-3 Franchise is from \$315,980 to \$825,260 including. This includes \$105,500 to \$105,700 that must be paid to the franchisor or its affiliates. The total investment necessary to begin operation of at three Core Progression ~~Business with three (franchised businesses under a Multi-3) #~~ franchises is from \$423,970 to \$1,187,890 including. This includes \$108,250 to \$108,550 that must be paid to the franchisor or its affiliates. The total investment necessary to begin operation of a four Core Progression ~~Business with four (4) franchises~~ franchised businesses under a Multi-5 Franchise is from \$582,960 to \$1,601,520 including. This includes \$162,000 to \$162,400 that must be paid to the franchisor or its affiliates. The total investment necessary to begin operation of a five Core Progression ~~Business with five (franchised businesses under a Multi-5) #~~ franchises is from \$690,950 to \$1,964,150 including. This includes \$164,750 to \$165,250 that must be paid to the franchisor or its affiliates.

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 Jon Cerf, 10693 Melody Drive, Northglenn, CO 80234, 303-484-1170.

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 Buying a Franchise,” which can help you understand how to use this disclosure document, is available from the Federal Trade Commission. You can contact the FTC at 1-877-FTC-HELP or by writing to the FTC at 600 Pennsylvania Avenue, NW, Washington, DC 20580. You can also visit the FTC’s home page at



This is a document preview downloaded from FranchisePanda.com. The full document is available for free by visiting: <https://franchisepanda.com/franchises/core-progression>