

IMPERIAL

HEALTH·SPA  
임페리얼 · 사우나 · 스포츠

April 27, 2007

To: Las Vegas Planning Department  
From: Imperial Health Spa  
Subject: Justification Letter

Dear Planning Department:

I have attached our Las Vegas Business Plan for the new Imperial Health Spa. As you can see, this is a very complex and intricate business plan we have adopted in order to be a success with our new venture into Las Vegas.

Currently, Imperial Health Spa is also located in the city of Garden Grove California. We have been in operation since 2002 and are opening another Health Spa in Gardena California. Our Garden Grove facility is in excess of 18K square feet and our new facility in Gardena will be approximately the same size.

In January of 2007, the Las Vegas City Council adopted an ordinance with additional restrictions as it relates to "Massage" establishments. Our facility is a **Health Spa** and massage is one of the many services offered such as, Men and Women's separate spa's offering, Skin Care, Beauty Salon, Tanning, Heated Mugwork Room, Sauna's (Salt Sauna) Steam and Dry Heat, Standing and Sitting Showers, Whirlpool's (2) Hot and Cold, Heated Quiet Rooms, Heated Jade Room, Gym, Aerobic Fitness, Juice Bars, Quiet Internet Access Room, Lounge Area and Restaurant.

The build out of our facility has taken into consideration 'handicapped access' and we are very proud of our not only meeting the required standards, but we have surpassed them.

Our Las Vegas facility operation covers approximately 31 thousand square feet and we respectfully request waivers in the following areas;

- (1) We be allowed to have massage offered as one of our services as we are within 400 feet of a church and school. (NOTE) When we began our build out, this was not an issue until the January 23, 2007 adoption of this ordinance. The school and church are directly behind our facility separated by a 6' wire fence.

**SUP-21649**

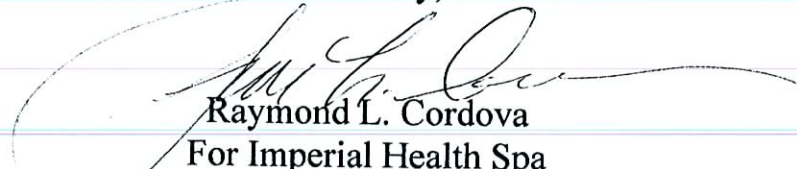
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*(justification letter continued)*

- (2) We also respectfully request to have the 1000-foot radius be waived as we are within 1000 feet of two "Massage" facilities.
- (3) Hours of operation: The new regulation restricts the hours of operation from 8:00 a.m. until 9:00 p.m. We respectfully request the hours be waived. It was our intention from the beginning to offer all services on a 24 hour operation as our clientele will primarily be coming from the 'Hotel" and 'Gaming' trade. We will certainly monitor the hours and desire to have the flexibility to be able to conduct our business in a professional manner and this is taking into consideration operating costs and convenience for our customers.

Sincerely,



Raymond L. Cordova  
For Imperial Health Spa  
Cell Phone: 562 301 3758 Fax: 702 732 7419

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