

LPGtrainingUSA.com
dba
European Face & Body Renewal
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April 27, 2009

Planning and Development Department
731 S. 4th Street
Las Vegas, NV

RE: Letter of Justification

Dear Sir or Madam,

This request is for a Special Use Permit for a Massage Establishment; with waivers to allow a zero-foot distance separation waiver from residentially zoned parcel where 400 feet is required; and a zero-foot distance separation waiver from Massage Establishment where 1000 feet is required.

LPGTrainingUSA.com, dba European Face & Body Renewal strives to be an asset to its customers and a model business entity. Endermologie® can provide meaningful cosmetic and therapeutic benefits to clients. However, that potential cannot be realized without proper training and support.

That is the primary focus of our business; to educate, inform and support. Part of the education process is ensuring that each Endermologie® treatment provider that comes through our doors be fully aware that they must actively research the unique business licensing requirements for their respective state.

We strive to set the best possible example in all areas, including this. Given that the State of Nevada has decreed that all Endermologie® treatments be provided by a fully licensed and certified Massage Therapist, we are enhancing our business model as a matter of necessity and compliance.

Endermologie® has been marketed as self described "lipo-massage". This means using an LPG mechanical device which massages the connective tissue using a non invasive three roll technology, combined with a gentle aspiration. All clients are wearing a full body stocking, providing hygiene, warmth and comfort. The primary purpose is a gentle massage of the fat cells which in turn reactivates the release of fatty acids and toxins. There is no application of creams nor any hands on during a normal Endermologie® session. In that context, a direct comparison between the service that we provide and traditional massage is not completely applicable.

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Nonetheless, in this business climate, and as a matter of survival, we need to be able to provide both comprehensive Endermologie® training and treatment. Therefore, our business must now be licensed as a Massage establishment, and that is the explicit reason for this “special use” and “privilege license” application process. We do not seek to become a traditional massage establishment, but we are, and always will be in full compliance with the laws and governance of the State of Nevada.

We will ensure that each treatment provider has proper documentation on hand, and on display. Furthermore, we fully support the more restrictive licensing requirement. It has been our observation that throughout Nevada and elsewhere, the level of overall physical therapeutic knowledge and skill for existing Endermologie® providers has not been sufficient to ensure the highest levels of practice and application. On the surface, this requirement would certainly raise the level of knowledge and expertise among treatment providers.

Waivers:

As stated, we do not intend, nor has it ever been our business model to compete with any existing traditional massage providers. The 1000’ exclusion requirement can safely be waived without detriment to any existing massage establishments that happen to fall within that range. In addition, the restriction of 400’ from any residential area can be waived without the fear that this business would at some point market lewd, or suggestive massage services that are intended to provide some level of sensuous stimulation. Anything that we do will always fall well within the realm of cosmetic or therapeutic application, and that is what our clients expect of us.

To summarize, this business license request is first and foremost a matter of compliance. Gretchen Givone is a globally recognized trainer and consultant on the practice of Endermologie®. In this economic climate, we need to have the flexibility to provide both training and treatments at our establishment. I can assure you that we will continue to operate at the highest levels of ethics, client care and business compliance.

Sincerely,

L. Eric Culverson
President;
LPGTrainingUSA.com dba European Face & Body Renewal

Sincerely,

Gretchen Givone
Certified Endermologie Consultant

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