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November 9, 2014

State of Nevada Board
Of Psychological Examiners
4600 Kietzke Lane, Building B-116
Reno NV 89502

Response by Hypnotherapists Union Local 472 AFL-CIO¹
To the Board of Psychological Examiners' ("Board")
July 9, 2014 Cease and Desist Letter ("C&D Letter")

The Meaning and Scope of "Hypnosis" and "Biofeedback"² Under
NRS 641.025, Including Legislative History.

"[I]t's unlawful to engage in (biofeedback/hypnosis) unless and until you are licensed as a psychologist."^{3 4}

¹ Hypnotherapists Union Local 472 of the Office and Professional Employees International Union of the AFL-CIO ("Local 472")

² One potentially complicating factor in the discussion to follow is that neither "hypnosis" nor "biofeedback" are defined under Nevada law. Therefore, it is not certain that every activity engaged in by the individual hypnotists, hypnotherapists and biofeedback practitioners who received the C&D letter would constitute "hypnosis" or "biofeedback" under NRS 641.025.

³ The full paragraph reads: "Please be advised that the practice of biofeedback/hypnosis is part of the practice of psychology as defined in NRS 641.025. Therefore it's unlawful to engage in either activity unless and until you are licensed as a psychologist." The letter went on to order the recipients to "immediately cease practice and or advertising the above activities."

⁴ As will be shown below, this is a misstatement of the law.

C&D Letter served on numerous parties.⁵

Hypnotherapists Union Local 472 AFL-CIO is requesting that the C&D Letter be withdrawn for the reasons discussed below.

Once the C&D Letter is withdrawn, then Board, Local 472, and others representing hypnotists, hypnotherapists and biofeedback practitioners may engage in concrete discussions about the concerns of the Board that led to the issuance of the C&D Letter. If there can be an open discussion of the Board's concerns, taking into consideration the mutual interests of psychologists, hypnotists, hypnotherapists and biofeedback practitioners, then these discussions can go forward with the goal of arriving at a clarification of the respective roles of psychologists, hypnotists, hypnotherapists and biofeedback practitioners in providing their respective services to members of the public in Nevada.

Is NRS 641.025 (1-10) Exclusive or Inclusive?
A Brief Summary of the Legislative History of NRS 641.025.

NRS 641.025 was amended in relevant part in 1995. The intent of those amendments is important in understanding the present confusion. The amending language was contained in 1995 Senate Bill 448 ("SB 448"):

1995 Statutes of Nevada, Page 2493 ([Chapter 640, SB 448](#))

Sec. 7. NRS 641.025 is hereby amended to read as follows:

641.025 "Practice of psychology" means the ~~[application of established principles and methods to understand, predict and influence human behavior including, but not limited to:~~

~~— 1. Principles of learning, perception and motivation.~~

~~— 2. Methods of interviewing, counseling, psychotherapy and modification of behavior.~~

~~— 3. Procedures for the construction, administration and interpretation of tests of mental ability, aptitude, attitude, personality and motivation.~~

~~— 4. The diagnosis, treatment, amelioration and prevention of emotional and mental disorders.]~~ ***observation, description, evaluation, interpretation or modification of human behavior by the application of psychological principles, methods or procedures to prevent or eliminate problematic, unhealthy or undesired behavior and to enhance personal relationships***

⁵ Some of whom are represented by Local 472.

and behavioral and mental health. The term includes, without limitation, such specialized areas of competence as:

- 1. Psychological testing and the evaluation of personal characteristics, including, without limitation, intelligence, personality, abilities, interests, aptitudes and neuropsychological functioning;*
- 2. Counseling;*
- 3. Psychoanalysis;*
- 4. Psychotherapy;*
- 5. Hypnosis;*
- 6. Biofeedback;*
- 7. Analysis and therapy relating to behavior;*
- 8. Diagnosis and treatment of mental or emotional disorders, including, without limitation, disorders of habit or conduct;*
- 9. Psychological aspects of physical injury, illness, accident or disability; and*
- 10. Evaluation, therapy, remediation and consultation relating to the academic performance of the patient.*

Or shown in another way (Language relevant to the present discussion in bold italics.):

NRS 641.025 “Practice of psychology” defined. “Practice of psychology” means the ***observation, description, evaluation, interpretation or modification of human behavior by the application of psychological principles, methods or procedures to prevent or eliminate problematic, unhealthy or undesired behavior and to enhance personal relationships and behavioral and mental health.*** The term includes, without limitation, ***such specialized areas of competence as:***

1. Psychological testing and the evaluation of personal characteristics, including, without limitation, intelligence, personality, abilities, interests, aptitudes and neuropsychological functioning;
2. Counseling;
3. Psychoanalysis;
4. Psychotherapy;
- 5. Hypnosis;**
- 6. Biofeedback;**
7. Analysis and therapy relating to behavior;
8. Diagnosis and treatment of mental or emotional disorders, alcoholism and substance abuse, including, without limitation, disorders of habit or conduct;
9. Psychological aspects of physical injury, illness, accident or disability; and
10. Evaluation, therapy, remediation and consultation relating to the academic performance of the patient.

(Added to NRS by [1985, 1906](#); A [1995, 2493](#); [1999, 204](#))

Therefore, “hypnosis” and “biofeedback” are “specialized areas of competence” used by psychologists in the practice of psychology. In other

words, these are modalities or tools that psychologists may use in the service of their clients' needs while practicing psychology.

That these "specialized areas of competence" are available to psychologists does not mean that they may *only* be used by psychologists. The singular question raised by the C&D Letter *as drafted* is whether only psychologists may use hypnosis or biofeedback in their practice in Nevada. As will be demonstrated herein, Nevada law (Specifically including NRS 641.029); legislative history; education and training respectively of psychologists, hypnotists, hypnotherapists, and biofeedback practitioners; limitations in competencies of the various healthcare practitioners, and the impact of the C&D Letter on the availability of services to members of the public⁶ all demonstrate that a wholesale prohibition against the practice of hypnosis and biofeedback by anyone other than licensed psychologists is not supported under the law in Nevada.

The reason given by those representing the Board at the time for the relevant changes is found in the Legislative History of SB 448.⁷ "Given the expansion of work in this field (Marriage and Family Therapists, professional counselors, motivational speakers, etc.), it is especially critical for the Board and public to understand the scope of psychology practice." (Page 13⁸).⁹ The Board lobbyist (P. Berkley) at the time testified that the changes were made to give a more specific answer to the question of "what does a psychologist do?" (Page 60).

In discussing a suggested change in language, Ms. Berkley testified that it was being proposed to address fears by hypnotists that the law could be construed "that unless one was a psychologist they would not be allowed to do hypnosis." She told the committee in response that: "[t]hat was incorrect. What they wanted to say was a psychologist may be trained and capable of doing hypnosis, but they were not trying to put anyone out of work. Therefore, *as long as a person did not call himself a psychologist, one could be a hypnosis counselor.*" (Page 47, emphasis added.).

⁶ This is only a sampling of the reasons supporting an inclusive (Depending on how hypnosis or biofeedback are being used, their use is not limited to psychologists only.) reading of NRS 641.025 rather than in exclusive (Only psychologists can use hypnosis or biofeedback.) reading.

⁷ URL:

<http://www.leg.state.nv.us/Division/Research/Library/LegHistory/LHs/1995/SB448,1995.pdf> - Pages cited are the pages of the document found at this URL.

⁸ Page numbers cited are the handwritten numbers added to the documents in the record.

⁹ Letter dated 5/17/95 by the Board authored by C. Peterson, President of the Board.

Later Ms. Berkley testified that it was not the Board's intention to cause such concern. "They (The Board) felt a person could be a counselor, a hypnotist or a 'whatever' as long as they did not call themselves a psychologist. They were very clear about it and all the other Boards had the same stipulation." (Pages 60-61).

Therefore, as to those practicing hypnotism, the Board at the time that SB 448 was being considered in the Legislature was concerned about title protection ("Psychologist"), not practice protection to the degree that those using hypnosis, hypnotherapy or biofeedback, but not holding themselves out to the public as "Psychologists," would be precluded from practice. Obviously, the application of NRS 641.025 as stated in the C&D Letter is in opposition to the Board's expressed position in 1995 before the Legislature.

During testimony before the Assembly Committee on Commerce, Assemblyperson C. Giunchigliani emphasized that: "[S]he did not want psychologists holding themselves out as hypnotists if that was not their area of specialization." (Pages 61.).

This latter issue was discussed at some length in testimony before the Legislature. The combined testimony of two Board members explained that while "counseling, psychoanalysis, psychotherapy, hypnosis and biofeedback" were included in the practice of psychology, it was necessary that: "...the individual should be trained for those specialties." "They (psychologists) were legally bound to practice only in their areas of expertise" (Page 50).

It was clear from the discussion that classes in hypnosis or biofeedback were not required to be taken to qualify for licensure as a psychologist, and were not even specifically addressed during the application review process (Pages 50-51). For a psychologist licensed in Nevada, if he or she had not been trained in hypnosis or biofeedback, the application of hypnosis or biofeedback *by the psychologist* would be outside their area of expertise. (Page 51).¹⁰

It is clear from the discussion in connection with SB 448, and the current regulations setting forth educational requirements for licensure as a psychologist (NAC 641.061), that an applicant could receive no specific training in hypnosis or biofeedback and still be licensed in Nevada as a psychologist.¹¹

¹⁰ An article on the American Psychological Association website notes that "[s]ome psychologists are trained in hypnosis..." (<http://www.apa.org/helpcenter/about-psychologists.aspx>). (Emphasis added.)

¹¹ Regarding equivalent courses that would need to be completed in an unaccredited program, NAC 641.061 lists a number of fields that might contain training in these areas, but "hypnosis" and "biofeedback" are not specifically listed, and as little as 3 semester hours might be required in the general category to qualify for licensure, with no indication how much of that time might be spent in

So despite the position expressed in the C&D Letter that “hypnosis” and “biofeedback” are limited to the scope of practice of psychology, there is no guarantee that a particular licensed psychologist has had sufficient training to practice in either of these areas. Nor is there any guarantee that he or she has had anything approaching training equivalent to that which many Nevada hypnotists, hypnotherapists, or biofeedback practitioners have had.

**Use of Hypnosis or Biofeedback in the Practice of Psychology
Is To Be Used in the Application of Psychological Principles.
Not All Hypnosis or Biofeedback Is the Practice of Psychology**

NRS 641.025 states in part that the Practice of Psychology is specifically performed “by the application of psychological principles, methods or procedures.” Therefore, all of the “areas of competence” listed in NRS 641.025 (1-10), including “hypnosis” or “biofeedback,” must be performed in the context of the “application of psychological principles, methods or procedures.”

Much of what hypnotists, hypnotherapists, and biofeedback practitioners do does not fall into this category. Further, because it is outside of their training, hypnotists, hypnotherapists, and biofeedback practitioners normally would not apply “psychological principles, methods or procedures” in assisting their clients.

Many, if not most, members of the public seek self-improvement when they seek the services of a hypnotist, hypnotherapist or biofeedback practitioner. When a potential client comes into their office stating that what they want help with are problems like the following:

- I want to be motivated to walk my dog more often.
- I want to try to get out of bed when my alarm clock rings instead of hitting the snooze button.
- I want to hit the tennis ball a little deeper in the court when I swing my racket.
- I want to resist my craving for Krispy Kreme Donuts for the next few months so I will fit in my wedding dress at my upcoming wedding.
- I don't want to focus so much on my husband's loud snoring when I try to fall asleep.
- I want to remember to wash my dirty dishes every day because it annoys my roommate when I leave them unwashed in the sink.

These individuals likely do not need the kind of in-depth diagnosis and treatment that would require the specialized expertise of a psychologist to address their concerns. Of course, if the client concerns are really symptomatic of deeper psychological issues, then they should be referred to someone who is

studying hypnosis or biofeedback. By contrast, some hypnotherapists in Nevada have at least 300 hours of education and 200 hours of supervised experience.

licensed to address those issues, and hypnotists, hypnotherapists, and biofeedback practitioners do make those referrals.

Therefore, insofar as the services provided by hypnotists, hypnotherapists or biofeedback practitioners do not involve the “application of psychological principles, methods or procedures,” then their use of hypnosis or biofeedback does not constitute the practice of psychology under NRS 641.025, and the C&D Letter is inapplicable to those practices. Again, as drafted, the C&D Letter is too broad. It seeks to prevent practices that actually do not fall within the scope of practice of psychologists. Therefore, it should be withdrawn.

**Hypnosis and Biofeedback Can Be Useful Tools
For Properly-Trained Psychologists, But
Use of Hypnosis and Biofeedback Is Not Limited to Psychologists.**

Paraphrasing Cole Porter, when it comes to hypnosis or biofeedback: “Physicians do it, Dentists do it, even Marriage and Family Therapists do it...”

The C&D Letter misstated the law when it said that one had to be a psychologist in order to engage in hypnosis or biofeedback. Under NRS 641.029, a number of licensed professions are exempt from this limitation.

NRS 641.029 Applicability of chapter. The provisions of this chapter do not apply to:

1. A **physician** who is licensed to practice in this State;
 2. A person who is licensed to practice **dentistry** in this State;
 3. A person who is licensed as a **marriage and family therapist** or **marriage and family therapist intern** pursuant to [chapter 641A](#) of NRS;
 4. A person who is licensed as a **clinical professional counselor** or **clinical professional counselor intern** pursuant to [chapter 641A](#) of NRS;
 5. A person who is licensed to engage in **social work** pursuant to [chapter 641B](#) of NRS;
 6. A person who is licensed as an **occupational therapist** or **occupational therapy assistant** pursuant to [NRS 640A.010](#) to [640A.230](#), inclusive;
 7. A person who is licensed as a **clinical alcohol and drug abuse counselor**, licensed or certified as an alcohol and drug abuse counselor or certified as an **alcohol and drug abuse counselor intern**, a clinical alcohol and drug abuse counselor intern, a **problem gambling counselor** or a **problem gambling counselor intern**, pursuant to [chapter 641C](#) of NRS; or
 8. Any member of the **clergy**,
- if such a person does not commit an act described in [NRS 641.440](#) or represent himself or herself as a psychologist.***

(Added to NRS by [1985, 1906](#); A [1987, 1122, 2123, 2134](#); [1989, 1540](#); [1991, 991](#); [1993, 1890](#); [1995, 2493](#); [1999, 1887, 3060](#); [2003, 1416](#); [2007, 3051](#))

(Licensed professions exempted in bold. Title protection language in bold italics.)

Furthermore, in Nevada, under NRS 48.039 (**NRS 48.039 Testimony of witness who previously underwent hypnosis to recall subject matter of testimony.**),

Hypnosis can be induced by:

- (1) A provider of health care;
- (2) A clinical social worker who is licensed pursuant to chapter 641B of NRS; or
- (3) An officer or employee or former officer or employee of a law enforcement agency, who is trained in forensic hypnosis and who is not otherwise currently involved in the investigation of a case or action in which the witness is a victim, witness or defendant.

NRS 48.039(1)(b)

In addition, under the regulations of the Nevada State Board of Nursing, a nurse anesthetist can perform hypnosis in connection with his or her duties. [NAC 632.500(1)(i)].

Therefore, the statement that one is required to be licensed as a psychologist to practice hypnosis or biofeedback in Nevada is simply incorrect, invalidating the basic legal premise underlying the C&D Letter. Some of the letters filed with the Board in response to the C&D Letter and contained in the record of the August 1, 2014 Board meeting materials reflect this fact.

If the C&D Letter misstates the law, then the C&D Letter should be withdrawn, and a dialogue instituted to discuss issues related to hypnosis and biofeedback. Prosecution for violation of the C&D Letter simply cannot be sustained on appeal.

A Brief Comment on the Webb Case:
Bad Cases Make Bad Law.

The common legal maxim is: "Hard cases make bad law." However, in this case, the Webb case¹² is a bad case for supporting the position taken by the Board in the C&D Letter.

Webb (At least the portion of the decision that affects the scope of practice issue we are discussing.) is a collection case. The plaintiff was attempting to collect fees paid to David Hopper, a licensed drug and alcohol counselor, who was not licensed at a psychologist. Services provided by Mr. Hopper included

¹² Webb v. Clark County School Dist., 125 Nev. 611 (2009)

biofeedback (EMGs) and diagnosing the Plaintiff with post-traumatic stress disorder. (125 Nev. 611, 624).

The Nevada Supreme Court (“Court”) opined that Mr. Hopper had engaged in the unlicensed practice of psychology, and therefore the plaintiff could not collect for what were illegal services under the law. (125 Nev. 611, 624). The Court concluded that a person cannot recover damages for psychological services rendered by a person who is not a licensed psychologist. (125 Nev. 611, 624).

It is important to note that the Webb case was decided in 2009, and that the Board is currently engaged in litigation that has been ongoing for some time with the same David Hopper named in the Webb case over the scope of his practice.

The conclusion drawn by the Court that Mr. Hopper was practicing psychology in the treatment of the Plaintiff, while true, is largely irrelevant for our purposes.

It is obvious that Mr. Hopper’s diagnosing the plaintiff with post-stress disorder is the practice of psychology. The reference to Mr. Hopper’s use of ‘biofeedback’ simply identifies it as a “specialized area pursuant to NRS 641.025(6)” without clarifying for what purpose it was used.

While the Court’s discussion of the public policy issues is useful (125 Nev. 611, 623) in the general sense, the reference to NRS 641C.065 (125 Nev. 611, 621), precluding drug and alcohol counselors from use of psychological or psychometric assessment tests, etc., significantly limits the application of the Webb case to drug and alcohol counselors and other licensees with like restrictions.

Webb is not a case dealing in detail with practice issues. It is a case involving issues relating to damages.

The other reason why the Board should be leery of relying too heavily on the Webb case is because the Board and its counsel are currently involved in litigation with Mr. Hopper in the 8th District regarding his scope of practice. Therefore, a position taken by the Board regarding limitations of scope of practice that relies on a previous case involving Mr. Hopper might be interpreted as being self-serving in its on-going dispute with him. The Board should not be put into a position where it is perceived as possibly taking a position regarding hypnosis and biofeedback simply to support its case against Mr. Hopper.

It is not Local 472’s position that the Board is not acting in good faith, only that by relying on a case involving Mr. Hopper, the Board’s actions may be interpreted by cynical viewers as presenting the appearance of impropriety.

**Psychologists, Hypnotist, Hypnotherapists, and Biofeedback Practitioners
Should Be Allowed To Work Together Cooperatively
To Provide the Best Service to Members of the Public.
The C& D Letter Makes Such Cooperation Illegal.**

It is clear from the Legislative Record (Pages 56 and 57), and from recent testimony before the Board, that a number of psychologists and hypnotists or hypnotherapists are working cooperatively to provide combined treatment in Nevada. It is not uncommon for psychologists to refer patients to hypnotists or hypnotherapists for specific treatment. This may be because the psychologist has more confidence in the training and experience of the specific hypnotist or hypnotherapist than he or she has in her own skills in this area. Or it may be because the psychologist does not have to time, or the experience, or the inclination to perform hypnosis or biofeedback services themselves. There may be other reasons why the psychologist believes this cooperative relationship may be in the best interest of his or client. The same can be said for working cooperatively with physicians.

In any event, in such a case, the psychologist has exercised his or her professional judgment and determined that it would be best for the hypnosis that his or her patient needs to be performed by a hypnotist or hypnotherapist that he or she trusts. At that point, assuming that the psychologist gives proper instructions, the hypnotist or hypnotherapist is working under the supervision of the psychologist, and the patient is receiving the combined effect of the treatment by the psychologist and the hypnotist or hypnotherapist. Hypnotists and hypnotherapists (And presumably also biofeedback practitioners.) also refer clients to psychologists when they discover that the needs of the client go beyond the scope of the hypnotist's or hypnotherapist's training and expertise.

The effect of the C&D Letter would be to preclude these professional relationships. If non-psychologists cannot perform hypnosis or biofeedback, then any hypnosis or biofeedback in Nevada has to be performed either by another psychologist, or by someone in the other exempt professions, assuming that the hypnosis or biofeedback performed is within their respective scope of practice and training. This complicates treatment very significantly, and will undoubtedly lead to increased expense of treatment.

This is not a practical solution to serve the public's needs.

**The Effect of the C&D Letter Is To Require Psychologists in Nevada to
Provide Hypnosis and Biofeedback Services in Areas Which Are
Beyond Their Scope of Practice.**

One of the questions that the Board must ask itself is whether psychologists or exempt licensees are ready to step into the gaps that will be created if hypnotists, hypnotherapists, and biofeedback practitioners are prevented from practicing in Nevada. Some of the more benign reasons that the public comes to hypnotists, hypnotherapists or biofeedback practitioners have already been noted. But there are more complex areas of practice in which hypnosis in particular is used regularly, and in which psychologists have no training at all.

A specific example might be instructive. The Board will be receiving a position paper from a certified Consulting Hypnotist and HypnoBirthing® child birth educator. She assists couples pre-birth, during birth, and post-birth to aid the mother in a more comfortable birth experience. Two questions arise: 1) Is what this hypnotist does truly the practice of psychology, and 2) if properly trained hypnotist are not allowed to perform these services – even under the supervision of an OB/GYN – then are psychologists going to fill the gap to perform these services for these couples? Put another way, are there any psychologists in Nevada qualified to provide these very specific services, or will these services have to be performed, if at all, by a physician?

As another example of an area in which hypnosis is used effectively, is in minimizing the side effects of chemotherapy.¹³ This is another beneficial use of hypnosis that would be outside the scope of practice of psychologists.

The Board has been put into in a position that would effectively preclude practice of hypnosis or biofeedback by anyone either not licensed under NRS 641.025 or exempt under NRS 641.029. Under the interpretation cited in the C&D Letter, *any* practice of hypnosis and biofeedback, no matter what the circumstances, is the practice of psychology. At the same time, if the C&D Letter means what it says, hypnotists or hypnotherapists will not even be able to practice in other areas, such as pain control, that are normally not within the scope of practice of psychology. It becomes a circular argument that serves no public interest.

There is a scope of practice Pandora's Box being opened by the C&D Letter as drafted, and the Board should not allow itself to be pushed into taking a broad public position that would potentially prevent members of the public from receiving necessary services that are not normally provided by psychologists.

**These Issues Have Been Addressed In Other Jurisdictions
Which Might Provide a Model for Nevada.**

¹³ American Cancer Society:
<http://www.cancer.org/treatment/treatmentsandsideeffects/complementaryandalternativemedicine/mindbodyandspirit/hypnosis>

Similar scope of practice issues have come up in other states and been resolved without the necessity of hypnotists, hypnotherapists or biofeedback practitioners fearing for the death of their respective professions.

California addressed similar scope of practice concerns by amending their law to allow psychologists and other exempt professions to provide hypnosis within their respective scope of practice. At the same time, the law allows other individuals to provide hypnosis to the public, so long as they do not offer therapy for emotional or mental disorders. Further, they can do so under referral from psychologists, physicians, etc., and can perform hypnosis for avocational or vocational self-improvement. The law contains also title protection.

So, in our neighboring state:

California Business and Professions Code Section 2908

2908. Nothing in this chapter shall be construed to prevent qualified members of other recognized professional groups licensed to practice in the State of California, such as, but not limited to, physicians, clinical social workers, educational psychologists, marriage and family therapists, optometrists, psychiatric technicians, or registered nurses, or attorneys admitted to the California State Bar, or persons utilizing hypnotic techniques by referral from persons licensed to practice medicine, dentistry or psychology, or persons utilizing hypnotic techniques which offer avocational or vocational self-improvement and do not offer therapy for emotional or mental disorders, or duly ordained members of the recognized clergy, or duly ordained religious practitioners from doing work of a psychological nature consistent with the laws governing their respective professions, provided they do not hold themselves out to the public by any title or description of services incorporating the words "psychological," "psychologist," "psychology," "psychometrist," "psychometrics," or "psychometry," or that they do not state or imply that they are licensed to practice psychology; except that persons licensed under Article 5 (commencing with Section 4986) of Chapter 13 of Division 2 may hold themselves out to the public as licensed educational psychologists.

This language is not being presented for adoption; it is simply an example of what another state has had in place for a number of years to address the same issues raised by the C&D Letter. Even if acceptable, this language would have to be modified to be appropriate for Nevada practice.

The letter response provided at the last meeting by the National Federation of Hypnotists 104 also contained examples of how other states have addressed these scope of practice issues. So it is very possible, if the Board is willing to work with those representing hypnotists, hypnotherapists and biofeedback practitioners, that a reasonable resolution can be effected to be benefit of the respective professions and the public alike. Regulatory language could be drafted to the same or like effect as the examples given.

However, for the reasons stated herein, the Cease and Desist Letter previously sent out by the Board must be withdrawn at this time. If it is not, then those of us representing those who have been served with that letter will have no option but to advise our clients of other legal options.

Thank you for considering these suggestions, and I and the Hypnotherapist Union Local 472 remain ready to work with the Board to find a mutually satisfactory resolution to this problem.

Sincerely,

Hal Taylor, Esq.
Representing
Hypnotherapists Union Local 472

HRT/ew
cc: Client