



To: Charles Wu, Zoning Administrator

From: Miriam Soler Ramos, City Attorney for the City of Coral Gables *MSR*

RE: Legal Opinion Regarding Microblading/Micropigmentation Establishments

Date: August 29, 2019

Based on our conversation during a meeting with Devin, Cristina, you and I, you are requesting guidance relating to whether a business that wishes to engage in microblading and/or micropigmentation is be considered a “tattoo parlor,” as listed in the definition of “problematic uses” in Article 8 of the Zoning Code.

The Zoning Code does not provide a definition for “tattoo parlor” however, these establishments are commonly characterized as employing tattoo *artists* who provide customers with the opportunity for permanent tattoos on any part of the costumer’s body, usually for the purpose of self/artistic expression. On the other hand, “microblading” is also known as “eyebrow embroidery” or “permanent makeup,” (even though it is considered semi-permanent) typically lasting 1-3 years, and is only performed on the costumer’s face. “Micropigmentation” is also a type of “permanent makeup” which is used to enhance the shape of an individual’s eyebrows, hairline, lips, eyes, or other parts of the face and surrounding areas. It is said to last longer than microblading (typically 3 to 5 years) but is not permanent. Consequently, both microblading and micropigmentation are services most similar to those received at a beauty salon or spa, and not at a “tattoo parlor.” These establishments should be considered spas and should be classified under “retail sales and services,” as defined in Article 8 of the Zoning Code.

This opinion is issued pursuant to Section 2-252(e)(1) and (8) of the City Code and Section 2-702 of the City’s Zoning Code.

Paulk, Enga

From: Ramos, Miriam
Sent: Thursday, August 29, 2019 10:56 AM
To: Paulk, Enga
Cc: Suarez, Cristina
Subject: FW: Opinion re. microblading/micropigmentation establishments

Enga, please publish.

Miriam Soler Ramos, Esq., B.C.S.

City Attorney

*Board Certified by the Florida Bar in
City, County, and Local Government Law*

City of Coral Gables
405 Biltmore Way, 2nd Floor
Coral Gables, FL 33134
(305) 460-5218
(305) 460-5084 direct dial



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From: Ramos, Miriam
Sent: Thursday, August 29, 2019 10:56 AM
To: Wu, Charles <cwu@coralgables.com>
Cc: Cejas, Devin <dcejas@coralgables.com>; Suarez, Cristina <csuarez@coralgables.com>
Subject: Opinion re. microblading/micropigmentation establishments

Charles,

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