

**BEFORE THE STATE OF NEVADA
BOARD OF MASSAGE THERAPY**

In the Matter of:

Hua Yang,

Licensed Massage Therapist
Nevada License No. NVMT.8935,

Respondent.

Case No. NVMT-C-2014

SUBPOENA

THE STATE OF NEVADA SENDS GREETINGS TO:

Detective Luis M. Simental-Corral
Las Vegas Metropolitan Police Department
400 S. Martin Luther King Blvd.
Las Vegas, NV 89106
E-Mail: L9844S@LVMPD.COM

YOU ARE HEREBY COMMANDED, pursuant to NRS 640C.750 to appear and provide testimony at a disciplinary hearing regarding:

Hua Yang, Licensed Massage Therapist, Nevada License No. NVMT.8935

Pursuant to Governor Steve Sisolak's Emergency Directive 006, there will be no physical location for this meeting. Participants can join the meeting via Zoom.

THE HEARING WILL TAKE PLACE:

Wednesday, August 19, 2020, commencing at 9:00 a.m.

Zoom sign-in available at 8:30 a.m.

Register in advance for this meeting:

<https://zoom.us/j/98844482882?pwd=YnVWeHBaMEtWZWFnZmdJRXRwYlpgQT09>

After registering, you will receive a confirmation email containing information about joining the meeting.

Meeting ID 988-4448-2882

Password 246012

A copy of the Complaint and Notice of Hearing filed in this matter is attached for your reference.

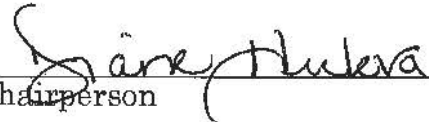
The Board will pay witness fees and mileage as allowed by NRS 640C.750 and NRCP 45. Please submit a claim to the Board for witness fees and mileage by sending it to the Board's Executive Director, Sandy Anderson at State of Nevada Board of Massage Therapy,

1755 E. Plumb Lane #252, Reno Nevada 89502, or transmit a copy of the claim by facsimile to (775) 786-4264. If you have questions about your submission, please contact Executive Director Sandy Anderson at (775) 687-9951.

IF YOU FAIL TO COMPLY with this Subpoena regarding the above-referenced individual, Hua Yang, Licensed Massage Therapist, Nevada License No. NVMT.8935, the Board may file an action to compel your compliance with the District Court pursuant to NRS 640C.750.

DATED this 4th day of August 2020.

STATE OF NEVADA
BOARD OF MASSAGE THERAPY

By: 
Chairperson

DECLARATION OF SERVICE

I hereby state that the assertions of this declaration are true:

On the 5 day of August 2020, I received the foregoing Subpoena and served the same upon Detective Luis M. Simental-Corral, via facsimile: 702-828-1551 with a courtesy copy by e-mail to L9844S@LVMPD.COM

Pursuant to NRS 53.045, I hereby certify, under penalty of perjury, that the foregoing is true and correct.

Executed on this 5 day of August 2020.



Signature of Person Making Service

Teresa Cantor

Printed Name of Person Making Service

1 BEFORE THE NEVADA STATE BOARD OF
2 MASSAGE THERAPY

3 In the Matter of:

4 Hua Yang,

5 Licensed Massage Therapist
6 Nevada License No. NVMT.8935,

7 Respondent.

Case No. NVMT-C-2014

**COMPLAINT AND
NOTICE OF HEARING**

8 The Nevada State Board of Massage Therapy (Board), by and through its Executive Director,
9 Sandra Anderson, hereby notifies Hua Wang ("Respondent") of an administrative hearing, which is
10 to be held pursuant to Chapters 233B, 622, 622A of the Nevada Revised Statutes (NRS) and 640C of
11 the Nevada Revised Statutes (NRS) and the Nevada Administrative Code (NAC). The purpose of the
12 hearing is to consider the allegations stated below and to determine if the Respondent should be
13 subject to an administrative penalty as set forth in NRS 640C.710, if the stated allegations are proven
14 at the hearing by the evidence presented.

15 Respondent is currently and at all times mentioned herein, licensed as a massage therapist in
16 the State of Nevada and is therefore, subject to the jurisdiction of the Board and the provisions of
17 NRS Chapter 640C.

18 IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

19 **ALLEGED FACTS**

- 20 1. On or about March 5, 2020, Respondent, while working at Cloud 9 Spa Massage located
21 at 4001 S. Decatur Blvd., Las Vegas, Nevada 89103, was arrested for soliciting sexual
22 activity to an undercover police officer during the course of practicing massage.

23 **VIOLATIONS OF LAW**

24 **COUNT ONE**

- 25 2. By soliciting sexual activity during the course of practicing a massage, Respondent
26 violated the provisions of NRS 640C.700(4) and/or (9). This is grounds for discipline
27 pursuant to NRS 640C.700(2).
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PRAYER FOR RELIEF

WHEREFORE, Executive Director, Sandra Anderson, prays as follows:

3. That the Board conduct a hearing on this complaint as provided by statute, and after such hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710, which may include the following, (a) the imposition of an administrative fine of not more than \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs incurred, (c) recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e) suspend, revoke or place conditions on the licensee's license, (f) place the licensee on probation, and/or (g) such other impositions as may be permitted by Nevada law.

PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this Administrative Complaint against the above-named Respondent in accordance with Chapters 233B, 622, 622A and 640C of the Nevada Revised Statutes.

Pursuant to Governor Steve Sisolak's Emergency Directive 006, there will be no physical location for this meeting. Participants can join the meeting via Zoom.

THE HEARING WILL TAKE PLACE:

Wednesday, August 19, 2020, commencing at 9:00 a.m.

Zoom sign-in available at 8:30 a.m.

Register in advance for this meeting:

<https://zoom.us/j/98844482882?pwd=YnVWwHbAMeTWZWFNzmdJRXRwYlpgQT09>

Meeting ID: 988 4448 2882

Password: 246012

PURSUANT TO NRS 622A.320, Respondent may, but is not required to, file an answer to this Complaint with the Board.

PURSUANT TO NRS 622A.330, Respondent may seek limited discovery from the Board.

As the Respondents, you are specifically informed that you have the right to appear and be heard in your defense, either personally or through counsel of your choice. You have the right to respond and to present relevant evidence and argument on all issues involved. You have the right to call and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant to the issues involved.

1 You have the right to request that the Board issue subpoenas to compel witnesses to testify
2 and/or evidence to be offered on your behalf. In making this request, you may be required to
3 demonstrate the relevancy of the witnesses' testimony and/or evidence.

4 The purpose of the hearing is to determine if the Respondent has violated the provisions of
5 Chapter 640C of NRS and if the allegations contained herein are substantially proven by the evidence
6 presented to further determine what administrative penalty is to be assessed against the Respondent,
7 if any, pursuant to NRS 640C.710.

8 Should the Respondent fail to appear at the hearing, a decision may still be reached by the
9 Board. As the Respondent, you are further advised that you may be charged with the attorney's fees
10 and/or costs associated with the hearing pursuant to NRS 622.400.

11 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
12 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
13 contacting Sandra Anderson, (775) 687-9951 or sjanderson@lmt.nv.gov.

14 Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may, without
15 further notice, take administrative action against your license and/or certificate to practice within the
16 State of Nevada if the Board determines that such administrative action is warranted after considering
17 your character, alleged misconduct, professional competence, or physical or mental health.

18 Dated this 16th day of July, 2020.

19 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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22 SANDRA ANDERSON, Executive Director
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 17, 2020, I deposited for mailing at Reno, Nevada, via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

Hua Yang
3859 S. Valley View Blvd, Ste 2-293
Las Vegas, NV 89103

9489 0090 0027 6226 3397 22

NEVADA STATE BOARD OF MASSAGE THERAPY



Employee

COPY