

BEFORE THE NEVADA STATE BOARD OF  
MASSAGE THERAPY

In the Matter of:  
Chien Yu Chen,  
Licensed Massage Therapist  
Nevada License No. NVMT.7145,  
Respondent.

Case No. NVMT-C-1921  
**COMPLAINT AND  
RE -NOTICE OF HEARING**

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

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

IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

**ALLEGED FACTS**

1. On or about August 30, 2018, Clark County Business License agents conducted an undercover investigation at New Shang Hai Massage located at 4350 Spring Mountain Rd., Las Vegas, Nevada 89102 wherein they encountered Respondent engaged in sexual activity with a male patron during the course of practicing massage.
2. Interview with the male patron revealed that he paid \$70 for an “entry fee” and an additional \$300 for sex.
3. Respondent was issued a citation for prostitution (misdemeanor citation #1-20606).

**VIOLATIONS OF LAW**

**COUNT ONE**

1 1. By engaging in sexual activity during the course of practicing a massage, Respondent  
2 violated the provisions of NRS 640C.700(4). This is grounds for discipline pursuant to NRS  
3 640C.700(2) and/or (9).

4 **COUNT TWO**

5 2. By being convicted of prostitution, Respondent violated the provisions of NRS  
6 640C.700(3). This is grounds for discipline pursuant to NRS 640C.700(2) and/or (9).

7 **PRAYER FOR RELIEF**

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

9  
10 3. That the Board conduct a hearing on this complaint as provided by statute, and after such  
11 hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710,  
12 which may include the following, (a) the imposition of an administrative fine of not more than  
13 \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs incurred, (c)  
14 recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e)  
15 suspend, revoke or place conditions on the licensee's license, (f) place the licensee on  
16 probation, and/or (g) such other impositions as may be permitted by Nevada law.

17 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this  
18 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B  
19 622, 622A and 640C of the Nevada Revised Statutes.

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

22 THE HEARING WILL TAKE PLACE:

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

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

25 Register in advance for this meeting:

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

27 Meeting ID: 988 4448 2882

28 Password: 246012

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

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

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

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

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

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

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

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

24 Dated this 17th day of JULY, 2020.

25 **NEVADA STATE BOARD OF MASSAGE THERAPY**

26   
27 \_\_\_\_\_  
28 SANDRA ANDERSON, Executive Director

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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:

Chien Yu Chen  
4325 El Conlon Avenue  
Las Vegas, NV 89102

9489 0090 0027 6226 3357 39

Lin Law Group  
Frances Arenas, Esq.  
5288 Spring Mountain Road Suite 103  
Las Vegas, NV 89146

NEVADA STATE BOARD OF MASSAGE THERAPY



Employee

COPY