1	BEFORE
2	MASS
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4	In the Matter of:
5	Ganghua Liu
6	Licensed Massage Therapist Nevada License No. NVMT.11132,
7	Respondent.
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9	The Nevada State Board of I
10	Director, Elisabeth Barnard, h
11	administrative hearing, which is t
12	Nevada Revised Statutes (NRS) ar
13	Nevada Administrative Code (NA
14	allegations stated below and to o
15	administrative penalty as set forth
16	at the hearing by the evidence pres
17	Respondent is currently and
18	therapist in the State of Nevada a
19	and the provisions of NRS Chapter
20	
21	IT IS HEREBY ALLEGED A
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23	
24	1. On or about November 30
25	located at 4650 W. Trop
26	taken into custody for se
27	during the course of prac

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## BEFORE THE STATE OF NEVADA MASSAGE THERAPY BOARD

Case No. NVMT-C-23100

COMPLAINT AND

NOTICE OF HEARING

The Nevada State Board of Massage Therapy (Board), by and through its Executive ector, Elisabeth Barnard, hereby notifies Ganghua Liu ("Respondent") of an ninistrative hearing, which is to be held pursuant to Chapters 233B, 622, 622A of the vada Revised Statutes (NRS) and 640C of the Nevada Revised Statutes (NRS) and the vada Administrative Code (NAC). The purpose of the hearing is to consider the

gations stated below and to determine if the Respondent should be subject to an ninistrative penalty as set forth in NRS 640C.710, if the stated allegations are proven he hearing by the evidence presented.

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

IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

## ALLEGED FACTS

1. On or about November 30, 2023, Respondent, while working at Your Massage Spa located at 4650 W. Tropicana Ave., Suite 118, Las Vegas, Nevada 89113, was taken into custody for soliciting sexual activity to an undercover police officer during the course of practicing massage.

## VIOLATIONS OF LAW COUNT ONE

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

## PRAYER FOR RELIEF

WHEREFORE, Executive Director, Elisabeth Barnard, 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.

THE HEARING WILL TAKE PLACE on Wednesday, March 20, 2024, commencing at 9:00 a.m. or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom or by appearing in person.

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

https://us06web.zoom.us/j/83570986231?pwd=zJv2aY3VR2oVwCdhbnsqZ74rimro5w.1

Meeting ID: 835 7098 6231 Password: 201609 Dial by your location +1 253 215 8782 US (Tacoma) +1 346 248 7799 US (Houston) +1 669 900 6833 US (San Jose) +1 301 715 8592 US (Washington DC) +1 312 626 6799 US (Chicago) +1 929 205 6099 US (New York)

Physical Location: 1755 East Plumb Lane, Suite 254, Reno, Nevada 89502 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.

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

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

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

Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation, agreed settlement, consent order, or default. Any attempt to negotiate this

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1	case should be made by contacting Elisabeth Barnard, (775) 687-9951 or
2	ebarnard@lmt.nv.gov.
3	Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may,
4	without further notice, take administrative action against your license and/or certificate to
5	practice within the State of Nevada if the Board determines that such administrative action
6	is warranted after considering your character, alleged misconduct, professional
7	competence, or physical or mental health.
8	Dated this <u>23rd</u> day of February , 2024.
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10	NEVADA STATE BOARD OF MASSAGE THERAPY
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12	hon
13	ELISABETH BARNARD, Executive Director
14	
15	CERTIFICATE OF SERVICE
16	I HEREBY CERTIFY that on February 23, 2024, I deposited for mailing at Reno,
17	Nevada, via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct
18	copy of the foregoing COMPLAINT AND NOTICE OF HEARING, properly addressed as
19	follows:
20	Complexe Line 9489 0090 0027 6449 4515 60
21	7432 Red Plumeria Avenue
22	Las Vegas, NV 89113
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24	NEVADA STATE BOARD OF MASSAGE THERAPY
25	China thatan
26	Suyuption
27	Employee
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