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2 **VIOLATIONS OF LAW**

3 **COUNT ONE**

4 2. By soliciting sexual activity during the course of practicing a massage,
5 Respondent violated the provisions of NRS 640C.700(4) and/or (9). This is
6 grounds for discipline pursuant to NRS 640C.700(2).
7

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Executive Director, Elisabeth Barnard, prays as follows:

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

18 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
19 Administrative Complaint against the above-named Respondent in accordance with
20 Chapters 233B, 622, 622A and 640C of the Nevada Revised Statutes.
21

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

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

26 Register in advance:

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

28 Meeting ID: 835 7098 6231

Password: 201609

1 Dial by your location
2 +1 253 215 8782 US (Tacoma)
3 +1 346 248 7799 US (Houston)
4 +1 669 900 6833 US (San Jose)
5 +1 301 715 8592 US (Washington DC)
6 +1 312 626 6799 US (Chicago)
7 +1 929 205 6099 US (New York)

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

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

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

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

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

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

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

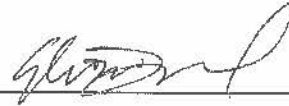
28 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by
stipulation, agreed settlement, consent order, or default. Any attempt to negotiate this

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 23rd day of February, 2024.

10 **NEVADA STATE BOARD OF MASSAGE THERAPY**

11 

13 ELISABETH BARNARD, Executive Director

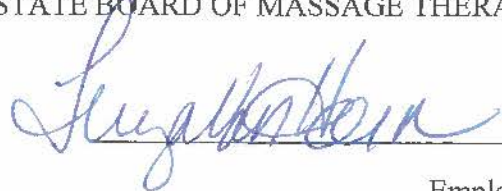
15 **CERTIFICATE OF SERVICE**

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:

21 Ganghua Liu
22 7432 Red Plumeria Avenue
23 Las Vegas, NV 89113

9489 0090 0027 6449 4515 60

24 **NEVADA STATE BOARD OF MASSAGE THERAPY**

25 

27 Employee