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BEFORE THE STATE OF NEVADA
MESSAGE THERAPY BOARD

Case No. NVMT-B-2402

**COMPLAINT AND
NOTICE OF HEARING**

In the Matter of:

Min Ling Huang,

Licensed Massage Therapist
Nevada License No. NVMT.3325,

Respondent.

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The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies Min Ling Huang (“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.

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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.

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IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

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ALLEGED FACTS

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1. On or about April 30, 2023, Respondent’s Massage Therapist license expired.
 2. On or about May 18, 2023, Board issued Respondent a citation for practicing with an expired license.
 3. On or about May 19, 2023, Respondent submitted her online renewal.

- 1 4. On or about May 22, 2023, Respondent was sent an invoice for the outstanding
2 citation for practicing with an expired license.
- 3 5. On or about May 24, 2023, the renewal was marked deficient, due to a photo
4 issue. As a result, Respondent's online renewal was not approved.
- 5 6. On or about May 30, 2023, Respondent re-submitted her renewal.
- 6 7. On or about May 31, 2023, the renewal was approved.
- 7 8. On or about June 2, 2023, the license was mailed to Respondent's address on file.
- 8 9. At all times relevant, Respondent failed to pay her citation for the amount of
9 Three Hundred and Fifty Dollars (\$350.00).
- 10 10. On December 11, 2023, Board sent Respondent the past due notice and gave her
11 15 calendar days to pay her outstanding balance.
- 12 11. At the time relevant to this Complaint, Respondent has not made any attempt to
13 communicate with the Board regarding her past due citation.

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15 **VIOLATIONS OF LAW**

16 **COUNT ONE**

- 17 12. By failing to pay an administrative fine and comply with the citation, Respondent
18 violated the provisions of NRS 640C.700(16) and/or (17). This is grounds for
19 discipline pursuant to NRS 640C.700(2).

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21 **PRAYER FOR RELIEF**

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

- 23 13. That the Board conduct a hearing on this complaint as provided by statute, and
24 after such hearing, that the Board impose upon Respondent the discipline
25 permitted by NRS 640C.710, which may include the following, (a) the imposition of
26 an administrative fine of not more than \$5,000.00 per violation, (b) recovery of
27 reasonable investigative fees and costs incurred, (c) recovery of attorney fees
28 pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e) suspend, revoke

1 or place conditions on the licensee's license, (f) place the licensee on probation,
2 and/or (g) such other impositions as may be permitted by Nevada law.

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

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

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

Register in advance:

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

12 Meeting ID: 835 7098 6231

13 Password: 201609

14 Dial by your location

15 +1 253 215 8782 US (Tacoma)

16 +1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

17 +1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

18 +1 929 205 6099 US (New York)

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

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

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

24 As the Respondents, you are specifically informed that you have the right to appear
25 and be heard in your defense, either personally or through counsel of your choice. You have
26 the right to respond and to present relevant evidence and argument on all issues involved.
27 You have the right to call and examine witnesses, introduce exhibits, and cross-examine
28 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
2 testify and/or evidence to be offered on your behalf. In making this request, you may be
3 required to 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
5 provisions of Chapter 640C of NRS and if the allegations contained herein are substantially
6 proven by the evidence presented to further determine what administrative penalty is to
7 be assessed against the Respondent, if any, pursuant to NRS 640C.710.

8 Should the Respondent fail to appear at the hearing, a decision may still be reached
9 by the Board. As the Respondent, you are further advised that you may be charged with
10 the attorney's fees 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
12 stipulation, agreed settlement, consent order, or default. Any attempt to negotiate this
13 case should be made by contacting Elisabeth Barnard, (775) 687-9951 or
14 ebarnard@lmt.nv.gov.

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

20 Dated this 27th day of February, 2024.

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22 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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26 ELISABETH BARNARD, Executive Director
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 27, 2024, 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:

Min Ling Huang
8351 Golden Cypress Avenue
Las Vegas, NV 89117

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NEVADA STATE BOARD OF MASSAGE THERAPY



Employee

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