

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Xin Liang,

Licensed Massage Therapist
Nevada License No. NVMT.7499,

Respondent.

Case No. NVMT-C-1959

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Xin Liang ("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 October 23, 2019, Respondent, owner of Emperor Foot Spa located at 3536 Wynn Rd., #5, Las Vegas, Nevada 89103, was arrested 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).

1 PRAYER FOR RELIEF

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

3 3. That the Board conduct a hearing on this complaint as provided by statute, and after such
4 hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710,
5 which may include the following, (a) the imposition of an administrative fine of not more than
6 \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs incurred, (c)
7 recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e)
8 suspend, revoke or place conditions on the licensee's license, (f) place the licensee on
9 probation, and/or (g) such other impositions as may be permitted by Nevada law.
10

11 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
12 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
13 622, 622A and 640C of the Nevada Revised Statutes.

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

16 THE HEARING WILL TAKE PLACE:

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

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

19 Register in advance for this meeting:

20 <https://zoom.us/j/98844482882?pwd=YnVWeHBaMEtWZWFnZmdJRXRwYlpqQT09>

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

23 Meeting ID 988-4448-2882

24 Password 246012

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

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

28 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

1 examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant
2 to the issues involved.

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

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

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

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

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

20 Dated this 4th day of August, 2020.

21 **NEVADA STATE BOARD OF MASSAGE THERAPY**

22 
23 _____
24 SANDRA ANDERSON, Executive Director
25
26
27
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1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on August __, 2020, I personally served James Smith, Esq., on
3 behalf of Xin Liang, a true and correct copy of the foregoing **COMPLAINT AND NOTICE OF**
4 **HEARING**, properly addressed as follows:

5
6 Xin Liang
3376 Tiara Point Circle
7 Las Vegas, NV 89146

8 James Smith, Esq.
9 7251 W. Lake Mead Boulevard #300
Las Vegas, NV 89128

10
11 Service Provider for the NEVADA STATE BOARD OF MASSAGE THERAPY

12
13 _____
Signature

14
15 **Reno Carson Messenger Service, Inc.**
16 **185 Martin Street**
17 **Reno, NV 89509**

<p>Nevada State Board of Massage Therapy 1755 E Plumb Ln Ste 252 Reno, NV 895023656</p>	<p>Brought to you by: Reno/Carson Messenger Service Inc  (775) 322-2424 Server: JOHN WHITE</p>
<p>GPS: 36.195572; -116.250332</p> <p><i>JW</i></p>	<p>CASE NUMBER: NVMT-C-1959</p>
<p>SUMMARY OF SERVICE</p>	<p>Reference No.: NVMT-C-1959 JOB COMPLETE R105077</p>

DOCUMENTS SERVED: COMPLAINT AND NOTICE OF HEARING;;

PARTY SERVED: James Smith, Esq.

BY LEAVING WITH: Jessica Whitefield, Community Manager

PHYSICAL DESCRIPTION: Age: 31-35 Weight: 161-180 Lbs Hair: Brown
Sex: Female Height: 5'1 - 5'6 Race: Caucasian

DATE & TIME OF SERVICE: 8/5/2020
2:03 PM

ADDRESS, CITY, AND STATE: 7251 W Lake Mead Blvd Ste 300
Las Vegas, NV 891288380

COMPLETED BY **JOHN WHITE** reg#: R-2019-00318

SUMMARY OF SERVICE

NVMT-C-1959
