

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Case No. NVMT-P-2200

Jialing Guo,

**COMPLAINT AND
NOTICE OF HEARING**

Licensed Massage Therapist
Nevada License No. NVMT.10454,

Respondent.

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Jialing Guo (“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 June 10, 2020, Respondent appeared before the Board regarding her license application that by Board policy, could not be administratively approved.
2. The Board approved a two-year probationary license that included:
 - a. Respondent must notify the Board of any changes in employment within ten calendar days;
 - b. Respondent will submit employment offers to the Board to the staff of the Board for review and approval;
 - c. Respondent’s employer will submit quarterly reports to the Executive Director;
 - d. Respondent must cooperate fully with Board staff to administrate terms of her probation; and

- 1 e. Respondent is to comply with all laws governing the practice of massage therapy.
- 2 3. On or about June 26, 2020, Respondent attended probation orientation.
- 3 4. On or about January 19, 2021, Respondent notified the Board that she was employed with
- 4 Advanced Pain Management & Family Care Associates (“Employer”).
- 5 5. Board staff was provided with periodic updates from Employer.
- 6 6. On September 5, 2021, Employer notified the Board that Respondent resigned.
- 7 7. On September 25, 2021, the Board sent a letter to Respondent requesting information
- 8 regarding her employment.
- 9 8. On or about October 1, 2021, Board investigator Vicki-Lynne Kitzman visited Employer
- 10 who indicated they were not familiar with Respondent.

11 **VIOLATIONS OF LAW**

12 **COUNT ONE**

- 13 9. By providing Board staff with false Employer reports, Respondent violated the provisions
- 14 of NRS 640C.700(1) and/or (9). This is grounds for discipline pursuant to NRS
- 15 640C.700(2).
- 16 10. By providing Board staff with false Employer reports, Respondent violated the provisions
- 17 of NRS 640C.700(13) and/or (9). This is grounds for discipline pursuant to NRS
- 18 640C.700(2).

19 **PRAYER FOR RELIEF**

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

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

1 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
2 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
3 622, 622A and 640C of the Nevada Revised Statutes.

4 THE HEARING WILL TAKE PLACE on **Wednesday, March 30, 2022, commencing at**
5 **9:00 a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by
6 Zoom.

7 Zoom sign-in available at 8:30 a.m.
8 Register in advance for this meeting:

9 <https://us06web.zoom.us/j/84202990113?pwd=ZDM2c25scnhBbmRydjR1S1hwS2d1QT09>

10 Meeting ID: 842 0299 0113

11 Password: 993954

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

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

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

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

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

27 Should the Respondent fail to appear at the hearing, a decision may still be reached by the
28 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 case should be made by
contacting Sandra Anderson, (775) 687-9951 or sjanderson@lmt.nv.gov.

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

5 Dated this 28 day of February 2022.

6 **NEVADA STATE BOARD OF MASSAGE THERAPY**

7 
8 SANDRA ANDERSON, Executive Director

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10
11 **CERTIFICATE OF SERVICE**

12 I HEREBY CERTIFY that on February 28, 2022, I deposited for mailing at Reno, Nevada,
13 via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the
14 foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

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16
17 Jialing Guo
18 4450 W. Via San Rafael
19 Las Vegas, NV 89103

20 **NEVADA STATE BOARD OF MASSAGE THERAPY**

21 
22 Employee

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