

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:
Pamika Kitsaengtana,
Licensed Massage Therapist
Nevada License No. NVMT.6910,
Respondent.

Case No. NVMT-C-21070

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Pamika Kitsaengtana (“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. Respondent, is and at all times herein, owner of Thai Massage Pro located at 4500 E. Sunset Rd, suite 2, Henderson, Nevada 89014 (“Establishment”).
2. On or about August 8, 2021, Phoovanad Jansanguan, while working at Establishment solicited sexual activity on AO during the course of practicing massage.
3. On or about June 20, 2021, Phoovanad Jansanguan, while working at Establishment, solicited sexual activity on a client during the course of practicing massage.
4. Phoovanad Jansanguan was not licensed with the Board until August 12, 2021.
5. Respondent knew of the employee’s conduct, unlicensed activity and arrest and failed to report to the Board that the employee had engaged in unethical or unprofessional conduct

1 as it relates to the practice of massage therapy within 30 days after becoming aware of the
2 conduct.

3 **VIOLATIONS OF LAW**

4 **COUNT ONE**

- 5 6. By failing to report that the holder of a license has engaged in unethical or unprofessional
6 conduct as it relates to the practicing a massage therapy within 30 days after becoming
7 aware of that conduct, Respondent violated the provisions of NRS 640C.700(10) and/or
8 (9). This is grounds for discipline pursuant to NRS 640C.700(2).

9 **COUNT TWO**

- 10 7. By permitting an unlicensed person to practice massage therapy at the Establishment,
11 Respondent violated the provisions of NRS 640C.700(6) and/or (9). This is grounds for
12 discipline pursuant to NRS 640C.700(2).

13 **PRAYER FOR RELIEF**

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

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

22
23 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
24 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
25 622, 622A and 640C of the Nevada Revised Statutes.

26 THE HEARING WILL TAKE PLACE on **Wednesday, March 30, 2022, commencing at**
27 **9:00 a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by
28 Zoom.

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

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

4 Meeting ID: 842 0299 0113

5 Password: 993954

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

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

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

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

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

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

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

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

1 Dated this 28 day of February, 2022.

2
3 **NEVADA STATE BOARD OF MASSAGE THERAPY**

4 
5 SANDRA ANDERSON, Executive Director

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7 **CERTIFICATE OF SERVICE**

8 I HEREBY CERTIFY that on February 28, 2022, I deposited for mailing at Reno, Nevada,
9
10 via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the
11 foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

12
13 Pamika Kitsaengtana
14 5863 Stoneborough
Las Vegas, NV 89113

15 NEVADA STATE BOARD OF MASSAGE THERAPY

16 
17 Employee

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19 9489 0090 0027 6421 3784 34