

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Guoli Song,

Licensed Massage Therapist
License No. NVMT.10890,

Respondent.

Case No. NVMT-P-2220

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Guoli Song (“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 March 31, 2021, Respondent appeared before the Board for regarding her license application that by Board policy, could not be administratively approved.
2. The Board Order dated May 19, 2021, approved a four-year probationary license that included:
 - a. No outcall services;
 - b. That she submit to annual background checks at her own expense, the first being within one year of the date of the Order; and
 - c. That she cooperate with Board staff during probation.
3. As of today, Respondent:
 - a. Has not submitted to a background check;

- 1 b. Has not cooperated with Board staff; and
2 c. Has not responded to Board letters dated February 17, 2022, and April 29, 2022.

3
4 **VIOLATIONS OF LAW**

5 **COUNT ONE**

- 6 4. By engaging in the activities alleged above, Respondent has not complied with the terms
7 of her probation, and therefore, Respondent violated the provision of NRS 640C.700(13)
8 and/or (9). This is grounds for discipline pursuant to NRS 640C.700(2).

9 **COUNT TWO**

- 10 5. By failing to respond to the Board's request for information within 60 days, Respondent
11 violated the provision of NRS 640C.700(8) and/or (9). This is grounds for discipline
12 pursuant to NRS 640C.700(2).

13 **PRAYER FOR RELIEF**

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

- 15 6. 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, October 26, 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.

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

1 Register in advance:
2 <https://us06web.zoom.us/j/89023133843?pwd=Mlp1SFYwT3FMdTIGSk93c0JIMHRHZz09>

3 Meeting ID: 890 2313 3843
4 Password: 649868

5 Dial by your location
6 +1 253 215 8782 US (Tacoma)
7 +1 346 248 7799 US (Houston)
8 +1 669 900 6833 US (San Jose)
9 +1 301 715 8592 US (Washington DC)
+1 312 626 6799 US (Chicago)
+1 929 205 6099 US (New York)
Meeting ID: 890 2313 3843
Passcode: 649868

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

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

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

18 You have the right to request that the Board issue subpoenas to compel witnesses to testify
19 and/or evidence to be offered on your behalf. In making this request, you may be required to
20 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 provisions of
22 Chapter 640C of NRS and if the allegations contained herein are substantially proven by the evidence
23 presented to further determine what administrative penalty is to be assessed against the Respondent,
24 if any, pursuant to NRS 640C.710.

25 Should the Respondent fail to appear at the hearing, a decision may still be reached by the
26 Board. As the Respondent, you are further advised that you may be charged with the attorney's fees
27 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 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 23 day of September, 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 September 23, 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:

15
16
17 Guoli Song
18 7366 W. Shelbourne Avenue
19 Las Vegas, NV 89113

9489 0090 0027 6461 1326 14

20 **NEVADA STATE BOARD OF MASSAGE THERAPY**

21 
22 Employee