## BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY

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In the Matter of:

Shubo Lin-Washmon,

Licensed Massage Therapist Nevada License No. NVMT.7334,

Respondent,

are proven at the hearing by the evidence presented.

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Case No. NVMT-C-21076

COMPLAINT AND NOTICE OF HEARING

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Shubo Lin-Washmon ("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

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 Spa One located at 5435 S. Fort Apache Rd., Suite 104, Las Vegas, Nevada 89048 ("Establishment").
- 2. On or about January 22, 2020, Chaoxia Fan, was arrested for soliciting sexual activity on an undercover police officer during the course of practicing massage.
- 3. On or about July 22, 2020, Chaoxia Fan, was arrested for soliciting sexual activity on an undercover police officer during the course of practicing massage.
- On or about October 26, 2021, Chaoxia Fan, while working at Establishment, was arrested for soliciting sexual activity on an undercover police officer during the course of practicing massage
- 5. Choaxia Fan was not and is not currently licensed with the Board.

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

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

 $\underline{https://us06web.zoom.us/j/84202990113?pwd=ZDM2c25scnhBbmRydjR1S1hwS2d1QT09}$ 

Meeting ID: 842 0299 0113 Password: 993954

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

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

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

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

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

Should the Respondent fail to appear at the hearing, a decision may still be reached by the 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.

Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may, without further notice, take administrative action against your license and/or certificate to practice within the

1	State of Nevada if the Board determines that such administrative action is warranted after considering
2	your character, alleged misconduct, professional competence, or physical or mental health.
3	Dated this day of
4	NEVADA STATE BOARD OF MASSAGE THERAPY
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6	CANDEA ANDERSON Every Director
7	SANDRA ANDERSON, Executive Director
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9	<u>CERTIFICATE OF SERVICE</u>
10	I HEREBY CERTIFY that on February 28, 2022, I deposited for mailing at Reno, Nevada,
11	via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the
12	foregoing COMPLAINT AND NOTICE OF HEARING, properly addressed as follows:
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15	Shubo Lin-Washmon 141 Elm Reed Avenue
16	Las Vegas, NV 89148
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18	NEVADA STATE BOARD OF MASSAGE THERAPY
19	Julia lastalin
20	Employee
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