

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;

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

**VIOLATIONS OF LAW**

**COUNT ONE**

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

**COUNT TWO**

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

**PRAYER FOR RELIEF**

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

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

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

THE HEARING WILL TAKE PLACE on **Wednesday, January 18, 2023, 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:

1 <https://us06web.zoom.us/j/85832292435?pwd=WDJhN1F6ZzF4WWYwZjFrZU9ZRitmUT09>

2 Meeting ID: 858 3229 2435

3 Password: 091855

4 Dial by your location

5 +1 253 215 8782 US (Tacoma)

6 +1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

7 +1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

8 +1 929 205 6099 US (New York)

9 Meeting ID: 821 7385 3899

Passcode: 788395

10 PURSUANT TO NRS 622A.320, Respondent may, but is not required to, file an answer to this  
11 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, if  
any, pursuant to NRS 640C.710.

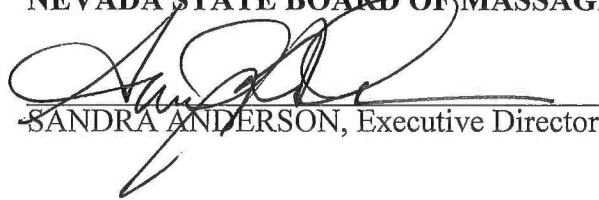
24 Should the Respondent fail to appear at the hearing, a decision may still be reached by the  
25 Board. As the Respondent, you are further advised that you may be charged with the attorney's fees  
26 and/or costs associated with the hearing pursuant to NRS 622.400.

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

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

8 Dated this 27th day of December, 2022.

9 **NEVADA STATE BOARD OF MASSAGE THERAPY**

10   
11 **SANDRA ANDERSON, Executive Director**

12  
13  
14 **CERTIFICATE OF SERVICE**

15 I HEREBY CERTIFY that on December \_\_\_\_, 2022, I personally served Guoli Song, a true and correct  
16 copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

17 Guoli Song  
18 7366 W. Shelbourne Ave.  
19 Las Vegas, NV 89113

20 Service provider for the NEVADA STATE BOARD OF MASSAGE THERAPY

21  
22 \_\_\_\_\_  
23 Signature

24 **Reno Carson Messenger Service, Inc.**  
25 **185 Martin Street**  
26 **Reno, NV 89509**

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**IN THE BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY  
IN AND FOR THE COUNTY OF CARSON CITY**

Plaintiff(s),  
VS.  
**In the Matter of: Guoli Song, Licensed Massage  
Therapist,**  
Defendant(s),

CASE NO: **NVMT-P-2220**

DECLARATION OF SERVICE

ss.:

**JOHN WHITE**, being duly sworn says: That at all times herein Affiant was and is a citizen of the United States, over 18 years of age, and not a party to nor interested in the proceedings in which this Affidavit is made.

That Affiant received copy(ies) of the **COMPLAINT AND NOTICE OF HEARING** On 12/29/2022 and served the same on 12/31/2022 at 8:37 AM by delivery and leaving a copy with:

2. **Jason Chan - Co-resident** a person of suitable age and discretion residing at Guoli Song's usual place of abode.

Served on behalf of Guoli Song, at Guoli Song's place of residence.

Service Address: 7366 W Shelbourne Ave, Las Vegas, NV 89113-4630

**A description of Jason Chan is as follows**

<b>Gender</b>	<b>Color of Skin/Race</b>	<b>Hair</b>	<b>Age</b>	<b>Height</b>	<b>Weight</b>
Male	Asian	Black	36-40	5'7 - 6'0	181-200 Lbs

Pursuant to NRS 239B.030 this document does not contain the social security number of any person.

Affiant does hereby affirm under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

STATE OF NEVADA  
COUNTY OF Clark

Executed on: 1/3/2023  
by JOHN WHITE  
Registration: R-2019-00318

No notary is required per NRS 53.045

X \_\_\_\_\_  
JOHN WHITE  
Registration: R-2019-00318  
Reno Carson Messenger Service, Inc #211  
185 Martin St.  
Reno, NV 89509  
(775) 322-2424  
www.renocarson.com

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