

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Shubo Lin-Washmon,
Licensed Massage Therapist
Nevada License No. NVMT.7334,
Respondent.

Case No. NVMT-P-2215

**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 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 30, 2022, pursuant to a legally noticed complaint, the Board approved a Stipulation for Settlement of Disciplinary Action and issued an Order that placed Respondent on a four-year probation, including a term to comply with all laws governing massage therapy.
2. Respondent is and all times relevant herein, the owner of Tea Tree Massage & Spa located at 1350 E. Flamingo Rd., Suite 22, Las Vegas, Nevada 89119 ("Establishment").
3. On or about June 9, 2022, Respondent, while working at Establishment was arrested and cited for soliciting sexual activity to an undercover police officer during the course of practicing massage.

- 1 4. On or about June 17, 2022, Nevada Division of Business Licensing cited the Establishment
2 for doing business without a license (massage).
- 3 5. On or about March 8, 2023, Qianyi Lin, while working at Establishment, was arrested and
4 cited for soliciting sexual activity to an undercover police officer during the course of
5 practicing massage.
- 6 6. Respondent knew of Qianyi Lin's conduct and arrest and failed to report to the Board that
7 the employee engaged in unethical or unprofessional conduct as it relates to the practice of
8 massage therapy within thirty (30) days after becoming aware of the conduct.
- 9 7. On or about March 13, 2023, Respondent submitted a renewal application and failed to
10 disclose the June 9, 2022, arrest.

11 **VIOLATIONS OF LAW**

12 **COUNT ONE**

- 13 8. By soliciting sexual activity during the course of practicing a massage, Respondent violated
14 the provisions of NRS 640C.700(4) and/or (9). This is grounds for discipline pursuant to
15 NRS 640C.700(2).

16 **COUNT TWO**

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

21 **COUNT THREE**

- 22 10. By violating the terms of probation, Respondent violated the provisions of NRS
23 640C.700(13) and/or (9). This is grounds for discipline pursuant to NRS 640C.700(2).

24 **COUNT FOUR**

- 25 11. By failing to disclose the June 9, 2022, arrest for soliciting sexual activity, Respondent
26 submitted false, fraudulent or misleading information to the Board violating the provisions
27 of NRS 640C.700(1) and/or (9). This is grounds for discipline pursuant to NRS
28 640C.700(2).

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Executive Director, Sandra Anderson, prays as followse

3 12. That the Board conduct a hearing on this complaint as provided by statute, and after such
4 hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.71C,
5 which may include the following, (a) the imposition of an administrative fine of not more than
6 \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs incurred, (c)
7 recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e)
8 suspend, revoke or place conditions on the licensee’s license, (f) place the licensee on
9 probation, and/or (g) such other impositions as may be permitted by Nevada law.
10

11 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
12 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
13 622, 622A and 640C of the Nevada Revised Statutes.

14 THE HEARING WILL TAKE PLACE on **Wednesday, August 8, 2023, commencing at 9:00**
15 **a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom or
16 by appearing in person.

17 Zoom sign-in available at 8:30 a.m.
18 Register in advance:

19 <https://us06web.zoom.us/j/84402330839?pwd=Q3hwb2lxSkNGQlpqYmhLV3N6dk1sQT09>

20 Meeting ID: 831 8510 9960

Password: 838829

21 Dial by your location

22 +1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

23 +1 669 900 6833 US (San Jose)

+1 301 715 8592 US (Washington DC)

24 +1 312 626 6799 US (Chicago)

25 +1 929 205 6099 US (New York)

26 Physical Location: 1755 East Plumb Lane, Suite 254, Reno, Nevada 89502

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

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

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

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

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

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

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

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

23 Dated this 7th day of July, 2023.

24 **NEVADA STATE BOARD OF MASSAGE THERAPY**

25 
26 SANDRA ANDERSON, Executive Director

27 **CERTIFICATE OF SERVICE**

1 I HEREBY CERTIFY that on July 7, 2023, I deposited for mailing at Reno, Nevada, via
2 Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing
3 **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
4

5 Shubo Lin-Washmon
6 141 Elm Reed Avenue
7 Las Vegas, NV 89148

9489 0090 0027 6461 1192 02

8 NEVADA STATE BOARD OF MASSAGE THERAPY

9 
10 Employee