

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Renuka Tongklom,
Licensed Massage Therapist
Nevada License No. NVMT.7923,
Respondent.

Case No. NVMT-C-22054

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Renuka Tongklom ("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, a licensed massage therapist in the state of Nevada.
2. On or about October 24, 2022, the Board received a complaint from Tammie Roitman, that Respondent borrowed a total of Ten Thousand Dollars (\$10,000.00) from her deceased husband, Norman Roitman, to be paid back in massages.
3. In or about 2020, Respondent began massaging Norman Roitman at his home.
4. On or about April 5, 2020, Respondent borrowed Five Thousand Dollars (\$5,000.00) from Norman Roitman to be paid back in massages.
5. On or about June 9, 2021, Respondent borrowed another Five Thousand Dollars (\$5,000.00) from Norman Roitman to be paid back in massages.

- 1 6. On or about October 4, 2021, Respondent bathed/toweled down Norman Roitman and
2 shampooed his hair.
3 7. On Respondent's license renewal application dated March 15, 2021, she stated that she
4 does not perform outcall services; when in fact, she does.

5 **VIOLATIONS OF LAW**

6 **COUNT ONE**

- 7 8. By bathing Norman Roitman and shampooing his hair, Respondent violated the provisions
8 of NRS 640C.700(9) as it relates to NAC 640C.410(d). This is grounds for discipline
9 pursuant to NRS 640C.700(2).

10 **COUNT TWO**

- 11 9. By borrowing Five Thousand Dollars (\$5,000.00) from a client, Respondent violated the
12 provisions of NRS 640C.700(9) as it relates to NAC 640C.410(o). This is grounds for
13 discipline pursuant to NRS 640C.700(2).

14 **COUNT THREE**

- 15 10. By borrowing another Five Thousand Dollars (\$5,000.00) from a client, Respondent
16 violated the provisions of NRS 640C.700(9) as it relates to NAC 640C.410(o). This is
17 grounds for discipline pursuant to NRS 640C.700(2).

18 **COUNT FOUR**

- 19 11. By stating on her license renewal application that she does not perform out call services
20 when she does, Respondent violated the provisions of NRS 640C.700(1) and/or NRS
21 640C.700(9). This is grounds for discipline pursuant to NRS 640C.700(2).

22 **PRAYER FOR RELIEF**

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

- 24 12. That the Board conduct a hearing on this complaint as provided by statute, and after such
25 hearing, that the Board impose upon Respondent the discipline permitted by NRS
26 640C.710, which may include the following, (a) the imposition of an administrative fine of
27 not more than \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs
28 incurred, (c) recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly

1 reprimanded, (e) suspend, revoke or place conditions on the licensee's license, (f) place the
2 licensee on probation, and/or (g) such other impositions as may be permitted by Nevada law.
3

4 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
5 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
6 622, 622A and 640C of the Nevada Revised Statutes.

7 THE HEARING WILL TAKE PLACE on **Wednesday, March 22, 2023, commencing at**
8 **9:00 a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by
9 Zoom.

10 Zoom sign-in available at 8:30 a.m.
11 Register in advance:

12 <https://us06web.zoom.us/j/85370113332?pwd=UnVlbFcvUWgxTElZYzJvbjdjOkMrZz09>

13 Meeting ID: 853 7011 3332
14 Password: 244142

15 Dial by your location
16 +1 253 215 8782 US (Tacoma)
17 +1 346 248 7799 US (Houston)
18 +1 669 900 6833 US (San Jose)
19 +1 301 715 8592 US (Washington DC)
20 +1 312 626 6799 US (Chicago)
21 +1 929 205 6099 US (New York)

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

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

25 As the Respondents, you are specifically informed that you have the right to appear and be
26 heard in your defense, either personally or through counsel of your choice. You have the right to
27 respond and to present relevant evidence and argument on all issues involved. You have the right to
28 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.

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

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

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

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

15 Dated this 21st day of February, 2023.

16 **NEVADA STATE BOARD OF MASSAGE THERAPY**

17 
18 SANDRA ANDERSON, Executive Director

19 **CERTIFICATE OF SERVICE**

20 I HEREBY CERTIFY that on February 21, 2023, I deposited for mailing at Reno, Nevada,
21 via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the
22 foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
23
24

25 RENUKA TONGKLOM
26 2024 PEYTON DR
27 LAS VEGAS, NV 89104

28 NEVADA STATE BOARD OF MASSAGE THERAPY


Employee

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