

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Chunfang Zhang,

Licensed Massage Therapist
Nevada License No. NVMT.11613,

Respondent.

Case No. NVMT-C-24028

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies Chunfang Zhang (“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 28, 2024, Respondent, while working at DD Bodyworks located at 4850 W. Flamingo Rd., #39 Las Vegas, NV 89103, was arrested for soliciting sexual activity to an undercover police officer during the course of practicing massage.

2. Specifically, during the massage, Respondent removed the towel covering the Officer without consent, touched his genitals, and offered and agreed to provide oral sex, all of which constitute sexual activity, as defined by NAC 640C.400.

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1 **VIOLATIONS OF LAW**

2 **COUNT ONE**

3 3. By engaging in and soliciting sexual activity during the course of practicing a massage,
4 as defined in NAC 640C.400, Respondent violated the provisions of NRS 640C.700(2), (4) and/or (9).
5 This is grounds for discipline pursuant to NRS 640C.700 and NRS 640C.710.

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Executive Director, Elisabeth Barnard, prays as follows:

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

15 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
16 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
17 622, 622A and 640C of the Nevada Revised Statutes.

18 THE HEARING WILL TAKE PLACE on **Wednesday, September 11, 2024, commencing**
19 **at 9:00 a.m.** or as soon thereafter, at 254 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may
20 also be attended virtually via Zoom. The Zoom information is as follows:

21 **<https://us06web.zoom.us/j/87910447853?pwd=B8PbS0eOO8NBSdiVIBkcPaVSL3g4sV.1>**

22 **Meeting ID: 879 1044 7853**

23 **Passcode: 071458**

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

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

27 As the Respondents, you are specifically informed that you have the right to appear and be
28 heard in your defense, either personally or through counsel of your choice. You have the right to

1 respond and to present relevant evidence and argument on all issues involved. You have the right to
2 call and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter
3 relevant to the issues involved.

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

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

11 If you require the services of an interpreter, one will be provided for you at no charge. Please
12 notify our office by calling (775) 687-9955 or emailing nvmassgeb@lmt.nv.gov by Wednesday,
13 September 4, 2024, of your request.

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

17 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
18 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
19 contacting Angela M. Lee, Esq. at amlee@ag.nv.gov.

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

24 Dated this 20th day of August, 2024.

25 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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ELISABETH BARNARD, Executive Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 20, 2024 I deposited for mailing at Las Vegas, Nevada, via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

Chunfang Zhang
4450 S. Hualapai Way, Unit 1164
Las Vegas, NV 89147

NEVADA STATE BOARD OF MASSAGE THERAPY



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