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**BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY**

In the Matter of:

Wen Juan Zhang,

Licensed Massage Therapist
Nevada License No. NVMT.785,

Respondent.

Case No. NVMT-C-24066

**VOLUNTARY LICENSE
SURRENDER AND SETTLEMENT
AGREEMENT RE DISCIPLINE**

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I, Wen Juan Zhang, wish to voluntarily surrender my Nevada Massage Therapy License. I am licensed as a massage therapist, license number NVMT.785, and was licensed at the time the conduct described herein occurred. As such, I am therefore subject to the jurisdiction of the Nevada State Board of Massage Therapy (the "Board").

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1. The factual allegations giving rise to this voluntary surrender and settlement agreement are as follows:

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- a. On or about June 13, 2024, I was working at Oriental Massage and Spa located at 4850 W. Flamingo Rd., Ste 3, Las Vegas, NV 89103.
 - b. At that time, I was accused of offering and agreeing to provide sexual activity to an undercover police officer, as defined by NAC 640C.400(2), (11), (15). (Las Vegas Metropolitan Police Department Case Report No. LLV240600052036).
 - c. I was cited by Las Vegas Metropolitan Police for soliciting sexual activity to an undercover police officer during the course of practicing massage. (Las Vegas Justice Court No.: 24-CR-059524).

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2. I admit that the Board could prove the foregoing factual allegations are true by a preponderance of the evidence.

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3. I understand that these facts constitute grounds for disciplinary action pursuant to NRS 640C.710 because the conduct violated NRS 640C.700(2), (4) and/or (9).

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4. I am aware of, understand, and have been advised of the effect of this Voluntary Surrender.

- 1 5. I have read this Voluntary Surrender and I fully understand and acknowledge its facts and
- 2 terms.
- 3 6. I am aware that I have certain constitutional rights, including:
- 4 (a) I have the right to hire an attorney to represent me in this proceeding;
- 5 (b) I have the right to demand a hearing on the charges against me, and I can require
- 6 the Board's staff to prove the allegations;
- 7 (c) I have the right to cross-examine the witnesses against me;
- 8 (d) I have the right to call witnesses to provide evidence on my own behalf;
- 9 (e) I have other rights accorded to me under the Nevada Revised Statutes
- 10 Chapters 233B, 622, 622A and 640C; and
- 11 (f) I have the right to obtain judicial review of the Board's decision.
- 12 7. I am aware of the foregoing rights, and I voluntarily, knowingly, and intelligently waive
- 13 these rights in return for the Board accepting my voluntary surrender of my massage therapist
- 14 license in lieu of other disciplinary action.
- 15 8. I understand this Voluntary Surrender is considered disciplinary action and as such will
- 16 become part of my permanent record.
- 17 9. I understand this Voluntary Surrender is considered public information.
- 18 10. I understand this Voluntary Surrender is considered disciplinary action and will be reported
- 19 to the national repository, which records disciplinary action taken against licensees, or any
- 20 agency or another state, which regulates the practice of Massage Therapy.
- 21 11. I am aware and understand that this Voluntary Surrender will be considered in any future
- 22 applications or petitions that I may submit to the Board, and that this Voluntary Surrender
- 23 may be considered as a basis for the denial of such an application or petition subject to the
- 24 Board's overall consideration of such an application or petition.
- 25 12. I understand this Voluntary Surrender may be used in any subsequent hearings by the Board
- 26 as evidence against me to establish a pattern of behavior and for the purpose of proving
- 27 additional acts of misconduct.
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13. This Voluntary Surrender shall not be construed as excluding or reducing any criminal or civil penalties or sanctions in any other matter.

14. I understand that this surrender is effective on the date it is accepted by the Board.

I, Wen Juan Zhang, by my signature affixed below, agree with the foregoing facts and representations and thus choose to voluntarily surrender my License to practice as a massage therapist in Nevada.

NEVADA STATE BOARD OF MASSAGE THERAPY retains jurisdiction in this case until all conditions have been met to the satisfaction of the Board.

NEVADA STATE BOARD OF MASSAGE THERAPY

Rebecca Dargatzidou
Board Chair

9/12/24
Date

RESPONDENT

[Signature]
Wen Juan Zhang, Respondent

9/5/24
Date