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LI HUI HE  
5

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

7 In the Matter of: )  
8 Li Hui He, )  
Licensed Massage Therapist )  
9 Nevada License No. NVMT 10915 ) **CASE NO.: NVMT-C-23085**  
10 Respondent. )  
11 ) **PETITION FOR RECONSIDERATION OF 10**  
12 ) **YEAR DEFAULT REVOCATION OF**  
13 ) **RESPONDENT'S MASSAGE LICNESE AND**  
14 ) **IMPOSITION OF FINES AND COSTS**  
15 )  
16 ) HEARING REQUESTED  
17 )

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18 **PETITION**

19 On November 30, 2023, The Nevada Board of Massage Therapy (NVMBT)  
20 issued an Order in the above-entitled case. The Order revoked the  
21 Massage License of Li Hui He for a period of ten years and fined Ms. He  
22 Five Thousand Dollars (\$5000.00) and imposed costs of One Thousand  
23 Dollars (\$1000.00) on Ms. He.

24 The Order was issued after the NVBMT hearing held on November 9,  
25 2023, which was set to address allegations that Ms. He engaged in  
prostitution-related activity while working as a massage therapist.

1           The Order issued noted that Ms. He was served via U.S. mail at the  
2 address listed with the NVBMT by Tereza Van Horne, a Board staff  
3 member.

4           Ms. He never received notice of the hearing. In her attached  
5 Declaration in Support of Motion for Reconsideration, Ms. He informs  
6 the Board that her now ex-husband intercepted the Notice of Hearing and  
7 deliberately did not inform her it had been sent to her. Ms. He's now  
8 ex-husband had forced her to work at the Ste. Rose Day Spa, and had  
9 committed acts of domestic violence upon her for not making enough  
10 money on a daily basis to keep him from having to work himself. When  
11 Ms. He got arrested, her ex-husband committed an act of domestic  
12 violence upon her and she then went to stay with a friend for some  
13 time. Eventually, she returned to their home. However, her ex-husband  
14 attempted to insist that she continue to work and to prostitute  
15 herself, so Ms. He left him. Ms. He moved out of the home to stay with  
16 friends. Mr. Wang retained the mailbox key and would not allow her to  
17 access her mail. When the Notice of Hearing was sent, her ex-husband  
18 kept it himself. When Ms. He received the Order of Revocation, she  
19 confronted her ex-husband, who then showed her the Notice of Hearing he  
20 had withheld.  
21

22           Upon receiving the Order, Ms. He contacted her attorney, who  
23 immediately contacted Ziwei Zheng at the Attorney General's office, who  
24 represents the NVBMT. Counsel explained the situation, and asked Ms.  
25 Zheng if he could get the matter on calendar to seek reconsideration of

1 the Board's decision. Counsel informed Ms. Zheng that, had he been  
2 aware of the hearing, he would have advised his client that he would  
3 have attempted to execute a voluntary surrender of her massage license  
4 for a period of three years, with no fine, which is a negotiation  
5 counsel has executed many times previous with the Massage Board. Ms. He  
6 indicated she would have accepted counsel's advice and surrendered her  
7 massage license.

8  
9 Li Hui He now requests that the NVBMT place this matter on  
10 calendar for reconsideration of the Board's decision made without Ms.  
11 He receiving actual notice of the hearing and therefore not  
12 participating in the hearing. Ms. He asks the Board to reconsider the  
13 10 year revocation and allow her to voluntarily surrender her license  
14 for a period of three years. Also, Ms. He requests that the Board  
15 reconsider the imposition of the \$5000 fine and \$1000 fee, as she has  
16 no way to pay those amounts.

17  
18 Dated: August 12, 2024

19  
20 /s/ Michael I. Gowdey  
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Attorney for Petitioner  
LI HUI HE

1  
2 DECLARATION OF LI HUI HE

3 I, LI HUI HE, hereby do swear and affirm under penalty of perjury  
4 that the following is true and correct:

5 1. I am the person named in the above- encaptioned matter. I applied  
6 for and was licensed by the Nevada Board of Massage Therapy, Massage  
7 License Number 10915.

8 2. I was previously married to a man named Wang Lingyun. We are now  
9 divorced. We had a difficult marriage, and he forced me to work in  
10 several Asian massage businesses. As part of that work, my ex-husband  
11 forced me to make money by engaging in prostitution. I was arrested for  
12 soliciting prostitution on two occasions while working at those massage  
13 businesses.  
14

15 3. I was the victim of domestic violence on several occasions as a  
16 result of my ex-husband demanding that I make money by engaging in  
17 prostitution.

18 4. After the last act of domestic violence, I moved out of our shared  
19 home. I was staying temporarily with friends. The Nevada Board of  
20 Massage Therapy apparently sent Notice of Hearing during this time  
21 period. My ex-husband did not notify me that he had received the Notice  
22 of Hearing, and in fact he hid it from me.

23 5. As a result of my not receiving notice, I did not attend the  
24 hearing at which my license was revoked and I was fined a total of  
25 \$6,000 in fines and investigative fees.

