

1 **VIOLATIONS OF LAW**

2 **COUNT ONE**

3 4. By being convicted of a crime involving violence and for endangering the safety of
4 coworkers by carrying out an act of violence as provided in NAC 640C.410, Respondent violated the
5 provisions of NRS 640C.700(2), (3) and/or (9). This is grounds for discipline pursuant to NRS
6 640C.700 and NRS 640C.710.

7 **PRAYER FOR RELIEF**

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

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

16 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
17 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
18 622, 622A and 640C of the Nevada Revised Statutes.

19 THE HEARING WILL TAKE PLACE on **Wednesday, October 23, 2024, commencing at**
20 **9:00 a.m.** or as soon thereafter, at 1755 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may
21 also be attended virtually via Zoom. The Zoom information is as follows:

22 <https://us06web.zoom.us/j/81343970844?pwd=cfae4rZh4nwlx8fh2B1EdLI51Xq1zu.1>

23 **Meeting ID: 813 4397 0844**

24 **Passcode: 242530**

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

27 PURSUANT TO NRS 622A.330, Respondent may seek limited discovery from the Board.
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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,
12 if any, pursuant to NRS 640C.710.

13 If you require the services of an interpreter, one will be provided for you at no charge. Please
14 notify our office by calling (775) 687-9955 or emailing nvmassgebd@lmt.nv.gov by Wednesday,
15 October 16, 2024, of your request.

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

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

22 Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may, without
23 further notice, take administrative action against your license and/or certificate to practice within the

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1 State of Nevada if the Board determines that such administrative action is warranted after considering
2 your character, alleged misconduct, professional competence, or physical or mental health.

3 Dated this 1st day of October, 2024.

4 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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8 ELISABETH BARNARD, Executive Director

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1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on October 1, 2024 I deposited for mailing at Las Vegas, Nevada,
3 via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the
4 foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
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6 Yanyang Li
7 300 Finsbury Ct.
8 Las Vegas, NV 89148

9 Lawrence C. Hill, Esq
10 Attorney at Law
11 2020 W. Sunset Rd.
12 Henderson, NV 89014

13 NEVADA STATE BOARD OF MASSAGE THERAPY

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16 Employee

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