

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

4
5 **PRAYER FOR RELIEF**

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

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

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
18 Chapters 233B, 622, 622A and 640C of the Nevada Revised Statutes.

19 THE HEARING WILL TAKE PLACE on Wednesday, May 29, 2024,
20 commencing at 9:00 a.m. or as soon thereafter as the Board is able to hear the matter
21 with video conferencing by Zoom or by appearing in person.

22 Zoom sign-in available at 8:30 a.m.

23 Register in advance:

24 <https://us06web.zoom.us/j/87977848022?pwd=ulkP7fVzoGLlseafe8BE5ifuemi4D0.1>

25 Meeting ID: 879 7784 8022

26 Password: 873579

27 Dial by your location

28 +1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

1 +1 301 715 8592 US (Washington DC)
2 +1 312 626 6799 US (Chicago)
3 +1 929 205 6099 US (New York)

4 Physical Location: 1755 East Plumb Lane, Suite 254, Reno, Nevada 89502

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

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

9 As the Respondents, you are specifically informed that you have the right to appear
10 and be heard in your defense, either personally or through counsel of your choice. You
11 have the right to respond and to present relevant evidence and argument on all issues
12 involved. You have the right to call and examine witnesses, introduce exhibits, and cross-
13 examine opposing witnesses on any matter relevant to the issues involved.

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

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

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

24 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by
25 stipulation, agreed settlement, consent order, or default. Any attempt to negotiate this
26 case should be made by contacting Deputy Attorney General Ziwei Zheng, (702) 486-3898
27 or zzheng@ag.nv.gov.

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

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

4 Dated this 25th day of April, 2024.

5
6 **NEVADA STATE BOARD OF MASSAGE THERAPY**

7 
8 ELISABETH BARNARD, Executive Director

9 **CERTIFICATE OF SERVICE**


10 I HEREBY CERTIFY that on April 26, 2024, I deposited for mailing at Reno,
11 Nevada, via Certified U.S. Mail, with return receipt and postage prepaid, a true and
12 correct copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly
13 addressed as follows:
14

15
16 Qiaofen Wei
17 3828 Delta Avenue
18 Rosemead, CA 91770

9489 0090 0027 6449 4519 04

19 Lin Law Group
20 Michael Lin, Esq.
21 5288 Spring Mountain Road Ste 103
22 Las Vegas, NV 89146

23 **NEVADA STATE BOARD OF MASSAGE THERAPY**

24 
Employee