

1 2. By soliciting sexual activity during the course of practicing a massage,
2 Respondent violated the provisions of NRS 640C.700(3), (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 3. 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 of
10 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, revoke
13 or place conditions on the licensee's license, (f) place the licensee on probation,
14 and/or (g) such other impositions 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
17 Chapters 233B, 622, 622A and 640C of the Nevada Revised Statutes.

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

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

22 Register in advance:

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

24 Meeting ID: 879 7784 8022

25 Password: 873579

26 Dial by your location

27 +1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

28 +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 have
11 the right to respond and to present relevant evidence and argument on all issues involved.
12 You have the right to call and examine witnesses, introduce exhibits, and cross-examine
13 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 to
15 testify and/or evidence to be offered on your behalf. In making this request, you may be
16 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 substantially
19 proven by the evidence presented to further determine what administrative penalty is to
20 be assessed against the Respondent, if any, pursuant to NRS 640C.710.

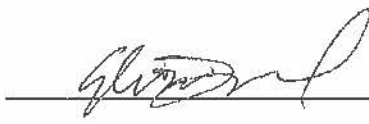
21 Should the Respondent fail to appear at the hearing, a decision may still be reached
22 by the Board. As the Respondent, you are further advised that you may be charged with
23 the attorney's fees and/or costs associated with the hearing pursuant to NRS 622.400.

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.

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

6 Dated this 3rd day of March, 2024.

7
8 **NEVADA STATE BOARD OF MASSAGE THERAPY**

9
10 
11 _____
12 ELISABETH BARNARD, Executive Director

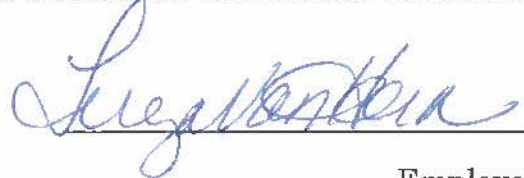
13 **CERTIFICATE OF SERVICE**

14 I HEREBY CERTIFY that on May 3, 2024, I deposited for mailing at Reno, Nevada,
15 via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of
16 the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as
17 follows:

18
19 Fang Wang
4111 Sanderling Cir. Unit 353
20 Las Vegas, NV 89103

9489 0090 0027 6449 4519 66

21
22 **NEVADA STATE BOARD OF MASSAGE THERAPY**

23
24 
25 _____
26 Employee