

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:
CUI LAN LI,

Licensed Massage Therapist
Nevada License No. NVMT.10438

Respondent.

Case No. NVMT-C-25007

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies CUI LAN LI ("Respondent") of an administrative hearing, which is to be held pursuant to Chapters 233B, 241, 622, and 622A of the Nevada Revised Statutes (NRS) and 640C of the Nevada Revised Statutes (NRS) and the Nevada Administrative Code (NAC). The purpose of the hearing is to consider the allegations stated below and to determine if the Respondent should be subject to an administrative penalty as set forth in NRS 640C.710, if the stated allegations are proven at the hearing by the evidence presented.

Respondent is currently and at all times mentioned herein, licensed as a massage therapist in the State of Nevada and is therefore, subject to the jurisdiction of the Board and the provisions of NRS Chapter 640C.

IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

ALLEGED FACTS

1. On or about January 22, 2025, Respondent, while employed with Lily Spa Massage located at 4631 Spring Mountain Rd., #103, was cited for engaging in/soliciting prostitution. (Case Report No. LLV250100079714).

2. Specifically, on that day, it is alleged that an undercover Las Vegas Metropolitan Police Detective (hereinafter "UC") entered into Lily Spa Massage and asked for a 30-minute massage. That massage was performed by your co-worker, Yan Wang.

1 on the licensee's license, (f) place the licensee on probation, and/or (g) such other impositions as may be
2 permitted by Nevada law.

3 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
4 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
5 622, 622A and 640C of the Nevada Revised Statutes.

6 THE HEARING WILL TAKE PLACE on **March 12, 2025, commencing at 9:00 a.m.** or as
7 soon thereafter, at 1755 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may also be attended
8 virtually via Zoom. The Zoom information is as follows:

9 <https://us06web.zoom.us/j/87362552149?pwd=pB7Fol92avA9nNgx3MsfZnoagpwQRe.1>

10 Meeting ID: 873 6255 2149

11 Passcode: 838718

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

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

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

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

23 The purpose of the hearing is to determine if the Respondent has violated the provisions of
24 Chapter 640C of NRS and if the allegations contained herein are substantially proven by the evidence
25 presented to further determine what administrative penalty is to be assessed against the Respondent,
26 if any, pursuant to NRS 640C.710.
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1 If you require the services of an interpreter, one will be provided for you at no charge. Please
2 notify our office by calling (775) 687-9955 or emailing nvmassgebd@lmt.nv.gov by Wednesday,
3 March 5, 2025, of your request.

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

7 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
8 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
9 contacting **Senior Deputy Attorney General Todd M. Weiss Esq. at 702-486-3103**

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

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15 Dated this 19th day of February, 2025.

16 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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20 ELISABETH BARNARD, Executive Director

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on February 19, 2025 I deposited for mailing at Reno, Nevada, via
3 Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing
4 **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
5

6 Cui Lan Li
7 8901 Sail Bay Drive
8 Las Vegas, NV 89117

9 Kirk Kennedy, Esq.
815 S Casino Center Blvd.
Las Vegas, NV 89101

10 NEVADA STATE BOARD OF MASSAGE THERAPY

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13 Employee

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Governor
Joe Lombardo

Executive Director
Elisabeth Barnard



Nevada State Board of Massage Therapy

February 12, 2025

Cui Lan Li
8901 Sail Bay Dr.
Las Vegas, NV 89117

Re: Cease and Desist Order

Dear Ms. Li:

The Nevada State Board of Massage Therapy (Board) has received information that you were charged with or cited for prostitution or any other sexual offense. Pursuant to NRS 640C.720(2), your license as a massage therapist is temporarily suspended for fifteen business days effective immediately after you receive this Cease and Desist Order. You are hereby ordered to cease and desist engaging in the practice of massage therapy.

The foregoing conduct may violate NRS 640C.700(2)(4) and/or (9). This is your opportunity to respond to the allegations pursuant to: NRS 233.B127(3). Please respond no later than 10 days from the date of this letter.

Due to the potential for possible action against your license as a massage therapist, you need to be aware of the following: (1) you have the right to consult with an attorney before you make any response to the allegations, or at any time during the course of an investigation however, it is not mandatory that you have an attorney represent you in any matters before the Board; (2) disciplinary action against you may affect your license as a massage therapist issued by the Board or any other state; and (3) in the event that there is formal disciplinary action taken by the Board, you may be charged for all financial costs related to investigation, settlement, and/or formal hearing of the complaint pursuant to NRS 622.400.

If you are represented by legal counsel, please have them send a letter of representation to our office as soon as possible.

If you have any questions, I can be reached at (775) 687-9951.

Cordially,

Elisabeth Barnard
Executive Director