

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:
HONGYING QUAN,

Licensed Massage Therapist
Nevada License No. NVMT.11895

Respondent.

Case No. NVMT-C-25068

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies HONGYING QUAN ("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 June 10, 2025, Respondent, while working at Kaya Spa located at 3380 E Russel Road #102, Las Vegas, NV 89120, you were cited for engaging in/soliciting prostitution. (Case Report No. LLV250600037158).

2. Specifically, on that day, it is alleged that an undercover Las Vegas Metropolitan Police Detective (hereinafter "UC") entered into Kaya Spa and asked for a 30-minute massage.

1 3. It is further alleged that, while performing the massage, you solicited the UC for sex
2 acts in exchange for money. Specifically, you agreed to engage in sexual intercourse in exchange for
3 \$300.

4 4. As a result, you were cited for engaging in unlawful prostitution.
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6 **VIOLATIONS OF LAW**

7 **COUNT ONE**

8 5. Soliciting sexual intercourse is defined as "sexual activity" under NAC 640C.400(1).
9 As such, Respondent violated NRS 640C.700(4) by engaging in and/or soliciting sexual activity during
10 the course of practicing massage.

11 **COUNT TWO**

12 6. As stated herein, Respondent violated the provisions of NRS 640C and NAC 640C,
13 as such, she has violated NRS 640C.700(2).

14 **COUNT THREE**

15 7. As stated herein, Respondent failed to abide by Nevada statutes and regulations
16 relating to the practice of massage therapy, which constitutes "Unethical or unprofessional conduct"
17 under NAC 640C.410(1)(q). As such, Respondent has violated NRS 640C.700(9).

18 **COUNT FOUR**

19 8. As stated herein, Respondent engaged in and/or solicited sexual activity with the UC,
20 which constitutes "Unethical or unprofessional conduct" under NAC 640C.410(1)(r). As such,
21 Respondent has violated NRS 640C.700(9).
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23 **PRAYER FOR RELIEF**

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

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

5 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
6 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
7 622, 622A and 640C of the Nevada Revised Statutes.

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9 THE HEARING WILL TAKE PLACE on **October 22, 2025, commencing at 9:00 a.m.** or as
10 soon thereafter, at 1755 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may also be attended
11 virtually via Zoom. The Zoom information is as follows:

12 <https://us06web.zoom.us/j/84159636052?pwd=b8LkkWLpWMINUJwcQgju90MJH6cgG.1>

13 Meeting ID: 841 5963 6052

14 Passcode: 929477

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

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

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

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

26 The purpose of the hearing is to determine if the Respondent has violated the provisions of
27 Chapter 640C of NRS and/or NAC and if the allegations contained herein are substantially proven by
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1 the evidence presented to further determine what administrative penalty is to be assessed against the
2 Respondent, if any, pursuant to NRS 640C.710.

3 If you require the services of an interpreter, one will be provided for you at no charge. Please
4 notify our office by calling (775) 687-9955 or emailing nvmassgebd@lmt.nv.gov by Wednesday,
5 October 15, 2025, of your request.

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

9 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
10 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
11 contacting **Senior Deputy Attorney General Stephanie Itkin, Esq.** at **702-486-3208**.

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

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17 Dated this 2nd day of October, 2025.

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19 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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22 _____
23 ELISABETH BARNARD, Executive Director
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CERTIFICATE OF SERVICE

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

Hongying Quan
6223 Meadow View Ln
Las Vegas, NV 89103

NEVADA STATE BOARD OF MASSAGE THERAPY

C. Brunner
Employee

9489 0090 0027 6603 6319 75