

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Suhua Sun,

Licensed Massage Therapist
Nevada License No. NVMT.11726

Respondent.

Case No. NVMT-C-24081

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies Suhua Sun ("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 6, 2024, Respondent, while employed with Castle Spa & Massage, located at 5980 Spring Mountain Rd., Ste 3, Las Vegas, NV 89146, was cited for soliciting prostitution. (Case Report No. LLV240600024535).

2. Specifically, on that day, an undercover Las Vegas Metropolitan Police Officer entered Castle Spa & Massage and requested a 30-minute massage.

3. The officer was taken to a massage room, told to undress, and lay face down on the massage table under a sheet. Respondent left the room while the officer undressed.

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1 4. Respondent re-entered the room and began to massage the officer.

2 5. Respondent massaged the officer's entire body, including his buttocks and inner thighs.

3 6. During the massage, Respondent asked the officer if he wanted "boom boom" while
4 making a thrusting motion with her hips. This question, coupled with the thrusting motion, indicated
5 to the officer that Respondent was offering sexual intercourse.

6 7. Respondent then instructed the officer to turn over.

7 8. The officer asked how much Respondent would charge for this sex act, to which
8 Respondent asked how much the officer had.

9 9. The officer responded that he had \$200, to which Respondent stated, "No, \$300."

10 10. The officer agreed to this amount and requested a condom.

11 11. Respondent left the room to retrieve the condom and returned with a condom in a paper
12 towel.

13 12. Las Vegas Metropolitan Police entered the building and cited Respondent for soliciting
14 prostitution. (Las Vegas Justice Court Case Number: 24-CR-058884).

15 13. Police also determined that Respondent was operating without a business license.

16 **VIOLATIONS OF LAW**

17 **COUNT ONE**

18 14. Soliciting sexual intercourse is defined as "sexual activity" under NAC 640C.400(1).
19 As such, Respondent violated NRS 640C.700(4) by engaging in or soliciting sexual activity during
20 the course of practicing massage.

21 **COUNT TWO**

22 15. As stated herein, Respondent violated the provisions of NRS 640C and NAC 640C, as
23 such, she has violated NRS 640C.700(2).

24 **COUNT THREE**

25 16. As stated herein, Respondent failed to abide by Nevada statutes and regulations relating
26 to the practice of massage therapy, which constitutes "Unethical or unprofessional conduct" under
27 NAC 640C.410(a)(2). As such, Respondent has violated NRS 640C.700(9).

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1 **COUNT FOUR**

2 17. As stated herein, Respondent engaged in sexual contact with the Officer, which
3 constitutes "Unethical or unprofessional conduct" under NAC 640C.410(b)(18). As such, Respondent
4 has violated NRS 640C.700(9).

5 **PRAYER FOR RELIEF**

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

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

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

17 THE HEARING WILL TAKE PLACE on **Wednesday, January 8, 2025, commencing at**
18 **9:00 a.m.** or as soon thereafter, at 254 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may
19 also be attended virtually via Zoom. The Zoom information is as follows:

20 <https://us06web.zoom.us/j/81140143759?pwd=jEcqL1bdrvuauo4AaSVmeZxGjet55t.1>

21 Meeting ID: 811 4014 3759
22 Passcode: 140912

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

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

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

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

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

11 If you require the services of an interpreter, one will be provided for you at no charge. Please
12 notify our office by calling (775) 687-9955 or emailing nvmassgeb@lmt.nv.gov by Tuesday,
13 December 31, 2024, of your request.

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

17 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
18 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
19 contacting Senior Deputy Attorney General, Todd Weiss at tweiss@ag.nv.gov or (702) 281-5256.

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

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1 Dated this 18th day of December, 2024.

2 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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5 ELISABETH BARNARD, Executive Director

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 18, 2024 I deposited for mailing at Reno, 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:

Suhua Sun
4072 Spitze Dr.
Las Vegas, NV 89103

NEVADA STATE BOARD OF MASSAGE THERAPY



Employee

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