

815 S. Casino Center Blvd., Las Vegas, NV 89101 Phone: (702) 385-5534 Facsimile: (702) 385-1869 Email: ktkennedylaw@gmail.com



August 26, 2025

Elisabeth Barnard Executive Director Nevada State Board of Massage Therapy 1755 E. Plumb Lane, Ste. 252 Reno, NV 89502

RE: Motion for Reconsideration-Silu Liu NVMT-C-25034

Dear Director Barnard:

Please accept this letter as a motion for reconsideration and/or rehearing of the Agenda matter from August 12, 2025, regarding Ms. Silu Liu. On August 12, there was a Complaint matter set for hearing for Ms. Liu, however, she did not appear and did not have any representative at the time. In her absence, the Board moved forward with a revocation of her license by default and imposed fines totaling \$20,000. My client was unaware of the necessity to appear and defend the Complaint matter.

Ms. Liu contacted my office and advised that she had no understanding about the Complaint process and due to language difficulties, she was unaware that she had an obligation to appear on August 12. On behalf of my client, I am requesting the Board's consideration to allow a rehearing of this matter on the next Agenda in October. Ms. Liu's lack of understanding regarding the Complaint process and the requirements to attend the designated hearing all contributed to her non-appearance. Given the severity of the Board's action, my client would request an opportunity to actually defend the matter with Counsel.

Kindly advise if the Board will allow a rehearing of the matter. I believe this is Ms. Liu's first disciplinary matter and she does desire to either contest the Complaint or attempt a possible resolution of the case. Thank you.

Yours truly,

Kirk T. Kennedy, Esq

BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY

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In the Matter of:

Licensed Massage Therapist

Nevada License No. NVMT.12234

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Case No. NVMT-C-25034

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Respondent.

WHEREAS on August 12, 2025, the administrative hearing held relative to the Complaint in the above-captioned matter having come before Nevada State Board of Massage Therapy ("Board"), and the Board being fully apprised in the premises, and good cause appearing, the Board issued the following findings of fact, conclusions of law, and order.

I. INTRODUCTION

- Board members present were Rebecca Dorangricchia, Chair, Paula Wilber,
 Vice Chair, Secretary-Treasurer Jenn Ty, Rosemarie Mueller, Bill Schoen, John Teng,
 and Sgt. Evan Fincher, LVMPD Advisory Member.
- Todd Weiss, Deputy Attorney General, was present and appeared as the prosecutor for the Board. Board General Counsel Collegen Platt was present and served as Board counsel.
- 3. SILU LIU ("Respondent") did not appear at the disciplinary hearing but was duly notified by certified mail in compliance with NRS 241.0333.

II. JURISDICTION

RESPONDENT is licensed by the Board as a massage therapist, pursuant

to the provisions of Nevada Revised Statutes and Nevada Administrative Code chapters 640C, license no. 12234.

 RESPONDENT is subject to the jurisdiction of the Board and the provisions of NRS Chapter 640C and NAC Chapter 640C.

III. FINDINGS OF FACT

- On or about March 12, 2025, Respondent, while employed with Wonderful Spa located at 4110 S. Maryland Parkway, Las Vegas, NV 89119, you were cited for engaging in/soliciting prostitution. (Case Report No. LLV250300044127).
- 7. Specifically, on that day, an undercover Las Vegas Metropolitan Police Detective (hereinafter "UC") entered into Wonderful Spa and asked for a 30-minute massage.
- 8. During said massage, you were not wearing clothing appropriate for a massage therapist.
- 9. During said massage, you removed all draping/covering from the nude UC and massaged his inner thigh area.
- 10. While performing the massage, you solicited the UC for a sex act in exchange for money. Specifically, without being solicited, and through a combination of verbal responses and non-verbal gestures, you agreed to perform manual sex and have sexual intercourse with the UC in exchange for \$100 and \$200, respectively.
- 11. As a result of the foregoing, you were cited for engaging in unlawful prostitution.
- 12. It was further discovered during a police search of the business that you had been residing within the business and had personal belongings there within apparent living quarters. You also voluntarily admitted to living within the business. As such, you were also charged with living in or about a brothel/house of prostitution.
 - 13. As a result of the foregoing events, you are currently facing multiple

IV. CONCLUSIONS OF LAW

- 14. Respondent, as evidenced by her actions as described above, is found by a preponderance of evidence to have violated multiple provisions of NRS 640C and NAC 640C. As such, she is in violation of NRS 640C.700(2).
- 15. Respondent, as evidenced by her actions as described above, is found by a preponderance of evidence to have solicitated sexual intercourse as defined as "sexual activity" under NAC 640C.400. As such, Respondent violated NRS 640C.700(4) by engaging in and/or soliciting sexual activity during the course of practicing massage.
- 16. Respondent, as evidenced by her actions as described above, is found by a preponderance of evidence to have failed to abide by Nevada statutes and regulations relating to the practice of massage therapy, which constitutes "Unethical or unprofessional conduct" under NAC 640C.410(1)(b)(17). As such, Respondent has violated NRS 640C.700(9).
- 17. Respondent, as evidenced by her actions as described above, is found by a preponderance of evidence to have engaged in and/or solicited sexual activity with the UC, which constitutes "Unethical or unprofessional conduct" under NAC 640C.410(1)(b)(13) and (18). As such, Respondent has violated NRS 640C.700(9).

V. ORDER

- 18. Having found by a preponderance of the evidence the Findings of Fact and Conclusion of Law set forth herein and having unanimously voted, THE BOARD HEREBY ORDERS:
- 19. Respondent's Board license, NVMT.12234, is hereby <u>revoked</u> and Respondent is ineligible to apply for new licensure for a minimum of five (5) years from the date of this Order.

- Respondent shall pay administrative fines in the amount of \$5,000 for each violation, for a total administrative fine of \$20,000 to be paid within five (5) years from the date of this Order.
- Respondent shall partially reimburse the Board for investigation and prosecution costs in this matter, in an amount not to exceed \$1,000. This amount shall be paid within five (5) years from the date of this Order.
- Failure of Respondent to pay the above ordered fines and cost reimbursement within the specified time period could result in Respondent being issued an Order to Appear and Show Cause from the Board who may then impose additional discipline on Respondent after hearing on the matter.

Dated this _______ day of October 2025.

NEVADA STATE BOARD OF MASSAGE THERAPY

Rebecca Dorangricchia, Chair

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Nevada Attorney General's Office

(s) Joseph Peter Ostunio, Esq.

Joseph Peter Ostunio, Esq. Deputy Attorney General



Nevada State Board of Massage Therapy

1755 E. Plumb Lane Suite 252 Reno, NV 89502 Phone (775)687-9955 Fax (775) 786-4264

Email: nymassagebd@lmt.nv.gov
Website: http://massagetherapy.nv.gov

October 2, 2025

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

Re: Notice of meeting of the Nevada State Board of Massage Therapy to consider the appeal or reconsideration of actions taken on August 12, 2025, regarding Silu Liu NVMT.12234. Case Number NVMT-C-25034.

Dear Mr. Kennedy.

The request to appeal the decision rendered by the Nevada State Board of Massage Therapy (Board) regarding Silu Liu at the August 12, 2025, meeting has been placed on the agenda for the Board for its meeting October 22, 2025. Participants can join the meeting via Zoom by using the website below, via telephone by dialing one of the numbers below, or by visiting 1755 E. Plumb Ln., Ste 254, Reno, NV 89502. The meeting will begin at 9:00 a.m.:

You may access the meeting by going to our meetings page and following the link to the next scheduled meeting at: https://massagetherapy.nv.gov/ then find the posted Zoom link.

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

Virtual access is available by registering for this meeting online:

https://us06web.zoom.us/i/84159636052?pwd=b8LkkWLpWMINUJwcQqiu90MJIH6cqG.1

Meeting ID: 841 5963 6052 Passcode: 929477

SIP • 84159636052@zoomcrc.com

Or go to https://massagetherapy.nv.gov/ and follow the link for our next scheduled meeting.

Telephonic access to this meeting available by dialing the number below based on the location closest to participant:

• +1 253 215 8782 US (Tacoma)

++1 346 248 7799 US (Houston)

• +1 669 444 9171 US

+1 669 900 6833 US (San Jose)

• +1 719 359 4580 US

+1 253 205 0468 US

• +1 386 347 5053 US

- +1 507 473 4847 US
- +1 564 217 2000 US
- +1 646 931 3860 US
- +1 689 278 1000 US

+1 929 205 6099 US (New York)

- +1 301 715 8592 US (Washington DC)
 - + +1 305 224 1968 US
 - +1 309 205 3325 US
 - +1 312 626 6799 US (Chicago)
 - +1 360 209 5623 US

Meeting ID: 897 7802 0789 Passcode: 908314

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

The meeting is a public meeting. You are not required to attend; however, attendance is recommended. Pursuant to NAC 640C.070 your completed investigation results may be discussed. You may choose to have an attorney or other representative of your choosing present during the meeting, present written evidence, provide testimony, present witnesses relating to your character, alleged misconduct, professional competence, or physical or mental health. Please be aware you are one of many agenda items, and the Board may take items out of order.

If the Board determines it necessary, after considering your character, alleged misconduct, professional competence, or physical or mental health whether in a closed meeting or open meeting, it may take administrative action against you at this meeting. This informational statement is in lieu of any notice that may be required pursuant to NRS 241.034. This notice is provided to you under NRS 241.033.

If you require an interpreter, please notify us by October 15, 2025, so that one may be scheduled at no cost to you.

If you have any questions, please feel free to contact the office at (775) 687-9955 or by emailing nymassagebd@lmt.nv.gov.

Sincerely,

Elisabeth Barnard Executive Director