

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

WEN HE,

Licensed Massage Therapist

Nevada License No. NVMT.12168

Respondent.

Case No. NVMT-C-25010

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies WEN HE ("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 31, 2025, Respondent, while employed with Bali Spa located at 5645 S. Eastern Ave., Ste. 7 Las Vegas, NV 89119 you were cited for engaging in/soliciting prostitution. (Case Report No. LLV250100113276).

2. Specifically, on that day, it is alleged that an undercover Las Vegas Metropolitan Police Detective (hereinafter "UC") entered into Bali Massage 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 \$400.

4 4. As a result, you were cited for engaging in unlawful prostitution.

5 **VIOLATIONS OF LAW**

6 **COUNT ONE**

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

10 **COUNT TWO**

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

13 **COUNT THREE**

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

17 **COUNT FOUR**

18 8. As stated herein, Respondent engaged in and/or solicited sexual activity with the UC,
19 which constitutes "Unethical or unprofessional conduct" under NAC 640C.410(1)(b)(18). As such,
20 Respondent has violated NRS 640C.700(9).

21 **PRAYER FOR RELIEF**

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

23 1. That the Board conduct a hearing on this complaint as provided by statute, and after
24 such hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710, which
25 may include the following, (a) the imposition of an administrative fine of not more than \$5,000.00 per
26 violation, (b) recovery of reasonable investigative fees and costs incurred, (c) recovery of attorney fees
27 pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e) suspend, revoke or place conditions
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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 **May 28, 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/81585388556?pwd=880mCOtyV9jDCMmrbrGIudxtxynWu4.1>

10 Meeting ID: 815 8538 8556

11 Passcode: 331435

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.

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, May
3 21, 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 9th day of May, 2025.

16 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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19 ELISABETH BARNARD, Executive Director
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I HEREBY CERTIFY that on May 9, 2025, 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:

Wen He
5560 Walcott Dr.
Las Vegas, NV 89118

Charles Goodwin
6671 Las Vegas Blvd S Suite 210
Las Vegas, NV 89119

NEVADA STATE BOARD OF MASSAGE THERAPY


Employee