

BOARD OF APPEALS, CITY & COUNTY OF SAN FRANCISCO

Appeal of
JING HUANG and LIYAN WANG, _____)
Appellant(s))
vs.)
DEPARTMENT OF PUBLIC HEALTH, _____)
Respondent)

Appeal No. **25-059**

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN THAT on December 26, 2025, the above named appellant(s) filed an appeal with the Board of Appeals of the City and County of San Francisco from the decision or order of the above named department(s), commission, or officer.

The substance or effect of the decision or order appealed from is the revocation on December 19, 2025, of a Massage Establishment Permit (permit revoked due to practitioners engaging in lewd conduct) at 3446 Balboa Street.

PERMIT NO. #ME-120465

FOR HEARING ON March 25, 2026

Address of Appellant(s):

Address of Other Parties:

Jing Huang and Liyan Wang, Appellant(s) c/o Paul Horcher, Attorney for Appellant(s) 601 Van Ness Avenue, Suite 928 San Francisco, CA 94102	N/A
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Date Filed: December 26, 2025

**CITY & COUNTY OF SAN FRANCISCO
BOARD OF APPEALS**

PRELIMINARY STATEMENT FOR APPEAL NO. 25-059

I / We, **Jing Huang and Liyan Wang**, hereby appeal the following departmental action: **REVOCATION of Massage Establishment Permit No. #ME-120465** by the **Department of Public Health** which was issued or became effective on: **December 19, 2025**, to: **Richmond Serenity Spa**, for the property located at: **3446 Balboa Street**.

BRIEFING SCHEDULE:

Appellants' Brief is due on or before: 4:30 p.m. on **January 29, 2026, (no later than three Thursdays prior to the hearing date)**. The brief may be up to 12 pages in length with unlimited exhibits. It shall be double-spaced with a minimum 12-point font. An electronic copy shall be emailed to: boardofappeals@sfgov.org, julie.lamarre@sfgov.org, and adam.radtke@sfcityatty.org

Respondent's and Other Parties' Briefs are due on or before: 4:30 p.m. on **February 12, 2026, (no later than one Thursday prior to hearing date)**. The brief may be up to 12 pages in length with unlimited exhibits. It shall be doubled-spaced with a minimum 12-point font. An electronic copy shall be emailed to: boardofappeals@sfgov.org, julie.lamarre@sfgov.org, and pvh831@gmail.com

Hard copies of the briefs do NOT need to be submitted to the Board Office or to the other parties.

Hearing Date: **Wednesday, February 18, 2026, 5:00 p.m., Room 416 San Francisco City Hall, 1 Dr. Carlton B. Goodlett Place**. The parties are encouraged to attend in-person but may also attend remotely via Zoom. Information for access to the hearing will be provided before the hearing date.

All parties to this appeal must adhere to the briefing schedule above, however if the hearing date is changed, the briefing schedule MAY also be changed. Written notice will be provided of any changes to the briefing schedule.

In order to have their documents sent to the Board members prior to hearing, **members of the public** should email all documents of support/opposition no later than one Thursday prior to hearing date by 4:30 p.m. to boardofappeals@sfgov.org. Please note that names and contact information included in submittals from members of the public will become part of the public record. Submittals from members of the public may be made anonymously.

Please note that in addition to the parties' briefs, any materials that the Board receives relevant to this appeal, including letters of support/opposition from members of the public, are distributed to Board members prior to hearing. All such materials are available for inspection on the Board's website at www.sfgov.org/boa. You may also request a hard copy of the hearing materials that are provided to Board members at a cost of 10 cents per page, per S.F. Admin. Code Ch. 67.28.

The reasons for this appeal are as follows:

See attachment.

Paul Horcher, attorney for appellants, submitted the appeal via email.

PRELIMINARY STATEMENT OF APPEAL

INTRODUCTION: Jing Huang and Liyan Wang ("Appellants"), owners of Richmond Serenity Spa ("the Spa") at 3446 Balboa St. respectfully appeal the DPH Director's Hearing Order (Cs. #25-03) after an unfair 11-20-25 Hearing, entered 12-23-25, and emailed to them on Xmas Eve ordering a harsh massage permit revocation, \$7,500 in fines, and a 5-year permit ineligibility.

FACTS: Appellants were shocked to receive the 7-16-25 DPH NOV regarding the alleged 06-17-25 incident, a month before, between an undercover officer ("decoy") and a Spa masseuse. They thought it odd that the decoy, a sworn officer, was so careless and negligent that he failed to question, identify, and detain the alleged rogue masseuse. They later learned that the officer has a history of being careless (suspended for 4 days by the SFPD Chief). Neither SFPD nor DPH alerted Appellants so they could have taken prompt remedial action. Before 07-16-25 they had no reason to suspect any of their masseuses of misconduct – they were all CAMTC Certified masseuses, passing FBI/DOJ level background checks. Although handicapped by the decoy's dubious decision not to detain, question, and identify the alleged rogue masseuse, Appellants, unlike the decoy, sharply questioned the 2 masseuses who were at the Spa on 06-17-25. They both adamantly denied any involvement with him. There were no arrests nor any criminal citations issued then against either Appellants or any employees, or at any time prior or after thereto. The Spa has been managed not to endanger the health and safety of the employees or clients.

ARGUMENTS: DPH denied Appellants a fair hearing by failing to follow its own hearing rules and the *U. S. Supreme Court* case of *Goldberg v. Kelly*, 397 U.S. 254 (1970), the seminal case concerning due process in administrative law cases. The appointed Hearing Officer was unfair and appeared partial to DPH. She refused to rule on a pending motion, prevented expert testimony, barred Appellant's face-to-face cross-examination of the decoy, and did not state the reason for her determination and indicate the evidence she relied on. She ignored written DPH hearing procedures, interfered with the presentation of Appellants' case, threatened Appellant's counsel, limited objections, and reacted petulantly to aggressive advocacy, *inter alia*.

GROUNDS FOR APPEAL: The Order is a flagrant, arbitrary, and capricious abuse of administrative discretion. DPH's illogical, excessive and unfair determination is not supported by the evidence and is patently contrary to the law – clearly an arbitrary and capricious abuse of administrative discretion.

BOARD ACTION REQUESTED: The Appellants are innocent of any wrongdoing alleged by DPH and the Order is contrary to the law; they respectfully request the Board overrule, or, impose just conditions on the Order.

Dated: 12-26-25


Paul V. Horcher, Attorney/Agent for Appellants



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Director's Hearing Order

Location Address 3446 Balboa Street	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa		
Property Owner Jing Huang		Phone 415-702-6468	Email richmondserenityspa@gmail.com	
Responsible Party or Parties Liyan Wang/Jing Huang	Attended Hearing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03

CODE SECTION(S) and DESCRIPTIONS

SFHC Article 29.17(b) - Lewd Conduct and Prostitution Prohibited
 SFHC Article 29.31(f) - Practitioner Conduct

HEARING OFFICER DETERMINATIONS:

After a full and fair consideration of the evidence and testimony received at the hearing on the above date, THE DIRECTOR FINDS AND DETERMINES THE FOLLOWING:

- That notice of the hearing has been duly given as required by law, and
- That your presence at the hearing is correctly designated above, and
- That the findings stated in the Inspection Report(s) are true, and

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That your Massage Establishment Health Permit #ME-120465 shall be revoked.
3. That business owners, Liyan Wang and Jing Huang, shall be ineligible for a Massage Business Permit for a period of five years from the date of permit revocation. This order applies solely to massage services and massage related activities. Nothing in this order prohibits the business owners from engaging in non-massage related services, provided such operations fully comply with all applicable laws and regulations and the prohibitions set forth in this order.

This Hearing Order continues on the next page.

IMPORTANT: Can you read this document? If not, we can have somebody help you read it. For free help, please call Department of Public Health at 415-252-3800.

请注意： 你是否理解信件的全部内容？如有任何问题,我们提供免费翻译服务,请致电三藩市公共卫生局 415-252-3800.

¿Puede leer este documento? Sí no puede, alguien lo puede ayudar. Para obtener ayuda gratis llame al Departamento de Salud Pública al (415) 252-3800.



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Director's Hearing Order (continued -- Page 2 of 3)

Responsible Party or Parties Liyang Wang/Jing Huang	Attended Hearing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03
Permit Number (if blank, this hearing did not involve a permit) ME - 120465	Permit Decision Revoke	Reinspection Fee Applies? <input type="checkbox"/> Yes as authorized by _____ <input checked="" type="checkbox"/> No		Reinspection Fee: n/a

4. That you shall pay the administrative penalty of \$7,500 for the occurrence of the violation as follows:
 SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.
 (A) Administrative fine: \$5,000 to be paid by Massage Establishment permittee

(12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises
 (A) Administrative fine: \$2,500 to be paid by Massage Business permittee, AND
 (B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit.

Should you have any questions, please contact:

Inspector Name: Ivy Phan	Inspector Phone 415-252-3986	Inspector Email ivy.phan@sfdph.org
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The aforementioned is a true copy of the orders issued in the name of the Director of Public Health in the City and County of San Francisco,

Hearing Officer Traci Lawrence	Hearing Officer Signature 	Date 12/19/25
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City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Director's Hearing Order (continued -- Page3 of3)

Responsible Party or Parties Liyang Wang/Jing Huang	Attended Hearing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03
Permit Number (if blank, this hearing did not involve a permit) ME - 120465	Permit Decision Revoke	Reinspection Fee Applies? <input type="checkbox"/> Yes as authorized by _____ <input checked="" type="checkbox"/> No		Reinspection Fee:

And Further, if checked, the following conditions are included in this order:

REINSPECTION FEE

That the Responsible Party named above pay the reinspection fee as authorized and shown above.

NUISANCE ABATEMENT

Failure to abate and remove the nuisance may result in the abatement of the nuisance by the Department of Public Health and the Property Owner shall become indebted to the City and County of San Francisco for the costs, charges, and fees incurred by reason of the abatement and removal of such nuisance upon demand.

COST RECOVERY

In accordance with the San Francisco Health Code, the Property Owner shall be indebted to the City and County of San Francisco for costs incurred in abating the effects of the violation, taking other remedial action, or imposing and collecting penalties, including but not limited to administrative costs, costs of issuing an order, inspection or monitoring costs, hearing officer costs, and reasonable attorney fees if sought by the Director in the Notice of Hearing. In any proceedings in which the Director seeks to recover attorney's fees, the prevailing party shall be entitled to reasonable attorney's fees. Failure to pay such costs, charges, and fees may result in a lien against the property.

APPEAL PROCESS if the case involves a Health Permit:

Within 15 days of receipt of this letter, you have the right to appeal this decision regarding your permit to the Board of Appeals. Appeals may be filed with the San Francisco Board of Appeals within 15 calendar days of the date of this notice. Appeals may be filed in-person (by appointment only), by phone ((628) 652-1150) or email (boardofappeals@sfgov.org). The Board's Office is located at 49 South Van Ness Avenue, Suite 1475. More information can be found on the Board's website at: <https://sf.gov/file-appeal-permit-or-decision>.

APPEAL PROCESS if the case involves a non-permitted facility and/or a penalty:

This Order is final and you may have the right to petition the Superior Court of San Francisco for judicial review or appropriate relief pursuant to Section 1094.6 of the California Code of Civil Procedures. The filing of a petition with the Superior Court shall not automatically stay the effectiveness of this Order or extend the time period in which you have to abate the violation

DPH USE ONLY

Decision Entry Date: 12/23/2025 Hearing Coordinator: ES
Initial

Should you have any questions, please contact:

Inspector Name: Ivy Phan	Inspector Phone 415-252-3986	Inspector Email ivy.phan@sfdph.org
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The aforementioned is a true copy of the orders issued in the name of the Director of Public Health in the City and County of San Francisco,

Hearing Officer Traci Lawrence	Hearing Officer Signature 	Date 12/19/25
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BRIEF SUBMITTED BY THE APPELLANT(S)

1 PAUL V. HORCHER, Esq. (SBN: 084882)
601 Van Ness Ave., #928
2 San Francisco, CA 94102-3257
3 Tel. 909-861-5555 | Fax. 415-301-4262 | Email: pvh831@gmail.com

4 Attorney for Appellants Jing Huang (“Ms. Huang”) and Liyan Wang (“Ms. Wang”)
DBA Richmond Serenity Spa (“the Spa”), 3446 Balboa Street
5

6 **SAN FRANCISCO BOARD OF APPEALS (“THE BOARD”)**

7 Appeal No. 25-059

8 Jing Huang and Liyan Wang
DBA Richmond Serenity Spa,
9 Respondent/Appellants,
10

**APPELLANTS’ BRIEF REQUESTING
THAT THE BOARD REVERSE DPH’S
DECISION TO REVOKE THE SPA’S
MESSAGE LICENSE AND DISMISS THE
ACTION WITH PREJUDICE**

11 vs.

12 City and County of San Francisco
Department of Public Health,
13

Hearing Date: March 25, 2026

14 Petitioner/Appellee.

15 **I. Introduction.**

16 Appellants, Jing Huang and Liyan Wang, owners of Richmond Serenity Spa (“the Spa”) request
17 that the Board of Appeals (“Board”) reverse the City and County of San Francisco’s Department of
18 Public Health’s (“DPH”) order revoking the Spa’s massage license, imposing a draconian and unjust
19 5-year ban on appellants seeking a massage license, and a total fine of \$7,500.00.¹ Appellants also
20 request a dismissal with prejudice based on the outrageous government conduct of the San Francisco
21 Police Dept. (“SFPD”) decoy police officer who allegedly allowed a rogue masseuse to rub his penis
22 with hot oil - conduct which, in appellants’ view, constituted police overtime pay abuse. The officer
23 made no detentions, arrests, did not identify the rogue masseuse or other witnesses, and did not notify
24 the owners of the incident, thereby depriving Ms. Huang and Ms. Wang or their ability to investigate
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¹ Ex. 1: Hearing Officer Traci Lawrence’s Revocation Order dated 11/20/25. (DPH Case No. MSG 25-03.)

1 and mount a defense to counter DPH’s allegations. To further compound the error SFPD and DPH
2 then refused to provide appellants with the audio recording and photos of the decoy operation which
3 would have exonerated appellants.

4 Thereafter, appellants were deprived of receiving a fair hearing conducted by an impartial hearing
5 officer as required by due process. The assigned Hearing Officer, believed to be a crony of DPH
6 upper management, engaged in rampant *ex parte* communications with DPH, actively solicited
7 evidence from DPH, and committed a wide array of other prejudicial legal errors rendering the
8 proceeding patently unfair and in violation of appellants’ state and federal due process rights. The
9 hearing officer refused to rule on defense counsel’s motion to exclude unreliable evidence and did
10 not allow the defense to call an SFPD veteran vice officer as an expert witness to testify that DPH’s
11 SFPD decoy officer’s behavior was inappropriate and contrary to standard police practices.

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14 **II. Facts.**

15 Ms. Huang and Ms. Wang (“owners”) are legitimate business owners with no prior record of
16 sustained city license violations. Ms. Huang became a state-licensed esthetician in 2007² and
17 Ms. Wang obtained massage certification from the *California Massage Therapy Council* in 2011. In
18 2015, the owners obtained a fictitious business name certificate for *Richmond Serenity Spa* then
19 located at 3443 Balboa Street. In 2016, they obtained a city DPH massage permit. The owners
20 complied with all the financially devastating COVID closure orders in 2020 totaling eight (8) months
21 and reopened again in early 2021. With her life savings, Ms. Huang bought the unit located at 3446
22 Balboa Street #1 on 4-13-23, and on 5-17-23, DPH accepted their application for a massage permit
23 at the new location. The state thereafter issued a new cosmetology license at the new location that
24 remains in good standing.³ After spending ~\$70,000.00 on interior improvements, and six (6) months
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28 ² Ex. 2: Appellants’ Hearing Chronology and Hearing Exhibit C (License No. 76542 – Board of Barbering and
Cosmetology.)

³ *Ibid.*

1 dealing with city bureaucracies, DPH inspected the premises and issued the owners Massage
2 Establishment Permit No. ME-120465 for the Spa at the new location. Owners unquestionably ran a
3 legitimate spa that offers massages, facials, and waxing.⁴ Per Ms. Huang, massage was approximately
4 80% of the Spa’s business; 50% of their clients are men; 30% are women, and 20% are couples.⁵

5
6 Per SFPD *Incident Report* (“IR”) 250337568, on 6-17-25, four officers began a *buy-walk*
7 operation at 4:00 p.m., believed to when SFPD overtime pay starts. The decoy, SFPD Sgt. Robert
8 Glenn, entered the Spa and paid for a massage.⁶ He took of his clothes and, and after a brief nude
9 massage, arranged with an unknown woman to get what is colloquially known as “*hand job*” for
10 \$60.00. Sgt. Glenn paid the woman, then allowed her to rub hot oil on his bare penis. He claimed he
11 stopped the massage and left when another police officer called and pretended to be his wife, but
12 Sgt. Glenn did not identify, detain, or arrest the masseuse nor any of the other people in the Spa.
13 Moreover, SFPD did not inform the owners of the incident for a full month and did not seek
14 criminal prosecution despite claiming that a prostitution crime had occurred. Sgt. Glenn stated that
15 he audio recorded his interaction with the masseuse and took photographs and booked the items into
16 evidence.⁷

17
18 A month later, on 7-16-25, DPH inspected the Spa and determined that it was sanitary and
19 that there were no violations. Nevertheless, DPH served owners with a *Notice of Determination*
20 (“NOD”) alleging violations of *SF Health Code* §§29.17(b) & 29.31(f) based on the 6-17-25, decoy
21 operation **and ordered owners to pay a \$7,500 fine; DPH did not then seek the suspension or**
22 **revocation of owners’ massage license permit.**⁸ Thereafter, SFPD and DPH initially refused to
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26 ⁴ Ex. 3: Declaration of Jing Huang, p. 2, para. 9.

⁵ *Ibid.*

27 ⁶ *The Standard* reported in 2022, that Sgt. Glenn and his team of subordinate officers allowed a kidnapping suspect to
bring a gun into the county jail when they did not properly search him. (Ex. 2: Appellants’ Hearing Chronology and
Hearing Exhibit A, fn 1.)

28 ⁷ Ex. 4: SFPD Incident Report (“IR”) 250337568.

⁸ Ex. 5: First NOD dated 7-23-25

1 produce the SFPD *IR* to the owners’ counsel requested pursuant to a *California Public Records Act*
2 (*PRA*) request.⁹ However, when owners’ counsel submitted a hearing request and informed DPH
3 that the owners could not prepare for a hearing without the report, DPH belatedly produced it
4 together with a retaliatory *Amended NOD* **materially escalating the punishment to a \$7,500 fine**
5 **plus a 60 day suspension.** ¹⁰ When counsel requested a continuance to allow adequate preparation
6 time to defend against the *Amended NOD*, DPH further retaliated against the owners for asserting
7 their right to a hearing and escalated the penalties even further in a *Second Amended NOD*; **DPH**
8 **now ordered owners to pay a \$7500 fine and sought to revoke the Spa’s massage permit** under
9 *SF Health Code §§ 29.45(a)(3) & (4)*; however, *subsection (4)* applied only to sex trafficking
10 charges or convictions as defined by *Penal Code § 236.1*, clearly not applicable here. ¹¹

12 Owners and owners’ counsel made numerous requests from both SFPD and DPH, for
13 Sgt. Glenn’s audio recording of the decoy operation and photographs that he represented he took at
14 the Spa and booked into evidence.¹² Owners believed the recording would exonerate them.
15 **However, the city violated all traditional notions of justice and fair play when it refused to**
16 **produce the recording and photographs to owners prior to the hearing despite that it was the**
17 **only objective evidence that existed** when Sgt. Glenn let an unidentified rogue masseuse rub his
18 penis with hot oil assuming, *arguendo*, that the incident occurred at all.¹³

19
20 On November 20, 2025, a city employee, Traci Lawrence, presided over the hearing as
21 DPH’s hearing officer.¹⁴ DPH historically has had licensed attorneys preside over DPH hearings
22 who are trained to adhere to due process principles and remain impartial as required by law.
23 However, Ms. Lawrence, a city employee who is not an attorney, violated the most rudimentary
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26 ⁹ Ex. 2: Appellants’ Hearing Chronology and Hearing Exhibits G & H; Cal. Gov’t. Code §7920.00, et seq.

27 ¹⁰ Ex. 6: First Amended NOD dated 8/25/25.

28 ¹¹ Ex. 7: Second Amended NOD dated 8/27/25.

¹² Ex. 8: Requests for SFPD Recording and Photographs.

¹³ *Ibid.*

¹⁴ Ex. 9: Hearing Video Recording

1 tenets of due process such as refraining from *ex parte* communications regarding the evidence,
2 ruling on pending motions and objections prior to the hearing, allowing owners a fair opportunity to
3 defend themselves by admitting relevant, reliable evidence, and maintaining a judicious
4 temperament. The record is replete with egregious errors that require reversal as discussed below.

Argument

I. The Revocation Order Should Be Reversed and Dismissed Because the City Deprived Ms. Huang and Ms. Wang of Their Due Process Right to a Fair Hearing

9 Appellants are entitled to a reversal and a dismissal with prejudice because they were not
10 afforded a fair hearing with an impartial hearing officer. Procedural due process under the *Fifth* and
11 *Fourteenth Amendments* to the *United States Constitution* and *Article I, Section 7* of the *California*
12 *Constitution* includes the right to be heard "*at a meaningful time and in a meaningful manner.*"
13 (*D & M Fin. Corp. v. City of Long Beach* (2006) 136 Cal. App. 4th 165.) When due process requires
14 a hearing, an impartial adjudicator is a basic requirement: the *United States Supreme Court* has stated
15 that "*a fair trial in a fair tribunal is a basic requirement of due process,*" and in the administrative
16 context "*an impartial decision maker is essential.*" (*Absmeier v. Simi Valley Unified Sch. Dist.*, (2011)
17 196 Cal. App. 4th 311.) The record is replete with errors that deprived appellants of a fair hearing as
18 discussed below.

A. DPH violated Appellants' due process rights when DPH issued an amended NOD and increased the penalties each time Appellants requested case evidence and a continuance to afford them a meaningful opportunity to be heard.

23 DPH violated appellants' right to due process when it increased the NOD penalty from a
24 \$7500 fine to a \$7500 fine plus a 60-day suspension after appellants submitted a hearing request
25 and pushed for a copy of the *SFPD Incident Report* and again when DPH increased the penalty to a
26 permit revocation immediately after appellants requested a continuance to prepare for the hearing.
27 DPH ratcheting up sanctions - culminating in permit revocation - supports an inference that DPH's
28

1 penalty-setting was not a neutral, record-based exercise of discretion but a punitive response to the
2 assertion of procedural rights. DPH repeatedly amending the NOD to increase penalties was done to
3 deter appellants participation in the hearing, as well as to hinder their ability to meaningfully
4 prepare for the hearing, rather than to adjudicate on the merits before an impartial tribunal. (*Cal.*
5 *Code Civ. Proc. 1094.5; Morongo Band of Mission Indians v. State Water Resources Control Bd.*
6 *(2009) 45 Cal. 4th 731.*) Even where an agency has discretion to select a sanction, courts will not
7 uphold a penalty that is arbitrary, capricious, or patently abusive. (*Coe v. City of San Diego (2016) 3*
8 *Cal.App.5th 772.*) Accordingly, the escalated fine/suspension/revocation should be reversed because
9 it was retaliatory and reflects a prejudicial abuse of discretion and a failure to proceed in the manner
10 required by law.
11

12 **B. Due process was violated when the city refused to provide SFPD's recording**
13 **of Sgt. Glenn receiving a massage and engaging in a sex act which would**
14 **have exonerated them.**

15 Appellants contend it was reversible error for the city to refuse to produce the audio
16 recording of Sgt. Glenn's undercover operation wherein he let a rogue masseuse massage his
17 genitals with oil. The city's refusal to produce the audio recording prevented the owners from
18 testing the accuracy and completeness of the City's proof and from presenting a full defense,
19 thereby skewing the record on which appellate review must occur. This is particularly true since
20 Sgt. Glenn did not detain, arrest, or even identify anyone in the massage parlor. Therefore, the
21 withholding of the recording, coupled with Sgt. Glenn's failure to identify the masseuse and
22 witnesses, undermines the fairness and reliability of the administrative adjudication and risks an
23 erroneous license revocation based on an incomplete record. Appellants were deprived of all
24 avenues to investigate or challenge the DPH's enforcement action because when important evidence
25 was withheld from them depriving them of the constitutional right to present evidence and mount a
26 defense.
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1 Moreover, appellants contend this recording would have exonerated them as counsel argued
2 at the hearing. It is well-settled that respondents must be permitted to see the evidence against them,
3 including exculpatory evidence, to ensure a fair process. (*Teacher v. California Western School of*
4 *Law* (2022) 77 Cal.App.5th 111; Cal Gov. Code 11507.6.) Therefore, their right to due process was
5 violated by DPH’s arbitrary and capricious failure to disclose the recording and photographs.
6

7 **C. Hearing Officer Lawrence Improperly Excluded Defense Expert Testimony**
8 **from retired SFPD Lieutenant Kilroy’s Whose Testimony Undermined the**
9 **Credibility of Sgt. Glenn the Sole Witness to the Alleged Act of Prostitution**

9 Appellants due process rights to a fair hearing were violated when Hearing Officer
10 Lawrence refused to allow them to call SFPD Lieutenant (Ret.) Raymond Kilroy, a 31-year SFPD
11 veteran and former officer in charge of the SFPD Vice Unit as an expert witness. ¹⁵ Had Lt. Kilroy
12 been allowed to testify, he would have destroyed Sgt. Glenn’s credibility. Lt. Kilroy reviewed the
13 SFPD *IR* in this matter and stated that decoy operations at massage parlors commencing at 4:00
14 p.m. when overtime pay begins are called “*cash raids*” or “*money raids*” in police circles. As
15 appellants pointed out at the hearing, Sgt. Glenn made more than \$180,000 in overtime pay in 2023
16 and his supervisor, Antonio Flores, who authorized the operation, made more than \$196,000. ¹⁶
17 Lt. Kilroy also stated that the report was not credible because it contained inaccuracies; that is was
18 “*abnormal for an uncover officer to strip naked and allow oil to be placed on his genitalia*” and that
19 he “*never once had a masseuse touch [his] genitals*” and that he never would have “*allowed that to*
20 *be an act of furtherance for himself or any of the officers under [his] command, to establish a*
21 *solicitation case or to close a massage case. Once you have solicitation, why go further?*” He
22 further stated that he could not imagine failing to cite or arrest the masseuse if what was stated had
23 happened. He also could not understand why the witnesses were not identified. He concluded that
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28 ¹⁵ Ex. 10: Declaration of SFPD Lieutenant (Ret.) Raymond Kilroy dated 10/9/25.

¹⁶ Ex. 2: Appellants Hearing Chronology (Exhibit A, p.2, fn.1.)

1 if there was not a justification for a prostitution citation, then there would be no justification for a
2 massage permit revocation. He added that it was irregular to revoke a massage parlor permit based
3 on one incident only alone because rogue masseuses do exist and many engage in inappropriate
4 behavior without an owner's knowledge. Therefore, a pattern of conduct is usually required before
5 the city moves to revoke a permit.¹⁷
6

7 Appellants assert Hearing Officer Lawrence committed reversible error when she refused to
8 allow this important expert witness to testify on grounds that it was speculative. Expert witnesses
9 do not need to have personal knowledge of an incident and Lt. Kilroy was not speculating. Rather,
10 he would have been testifying based on his training and experience. Appellants have the
11 *constitutional* right to call witnesses and to mount a defense to DPH's enforcement action. Sgt.
12 Glenn's failure to engage in appropriate investigative behavior called into question whether this
13 incident occurred at all, much less the way he reported that it did. Lt. Kilroy's testimony would
14 have struck at the heart of DPH's case and an impartial hearing officer would have exonerated
15 appellants.
16

17 **D. Hearing Officer Lawrence Engaged in Unlawful *Ex Parte* Communications**
18 **with DPH Prosecutors**

19 As a result of numerous errors that occurred during the hearing, the appellants submitted a
20 *PRA* request to the city, seeking, among other materials, email exchanges between Hearing Officer
21 Lawrence and DPH staff related to the appellant's hearing. DPH was dilatory in responding, and
22 when the records were ultimately produced in four separate batches, appellants concluded DPH
23 intentionally withheld the records because they revealed that Hearing Officer Lawrence was
24 engaged in unlawful *ex parte* discussion with DPH prosecutors, Michelle Vega and Ivy Phan, with
25 DPH Hearing Coordinator, Eurich Santiago, acting as the go between, forwarding emails back and
26
27
28

¹⁷ Ex. 10: Declaration of SFPD Lieutenant (Ret.) Raymond Kilroy dated 10/9/25.

1 forth.¹⁸ It is rudimentary law that *ex parte* communications are generally prohibited in California
2 administrative hearings, even when such hearings are not governed by the *Administrative Procedure*
3 *Act (APA)*. California courts have recognized that due process principles require a fair tribunal,
4 which includes the prohibition of *ex parte* communications to ensure fairness and impartiality. (See
5 e.g. *Nightlife Partners, Ltd. v. City of Beverly Hills* (2003) 108 Cal.App.4th 81.)
6

7 Here, Hearing Officer Lawrence, *ex parte*, collected case evidence, requested records from
8 DPH for her review, discussed *in limine* motions, and asked DPH factual questions regarding
9 appellants' prior hearing in 2021 where appellants were exonerated following a hearing by an
10 independent hearing officer who a licensed member of the California State Bar.¹⁹ Since appellants
11 were exonerated, the prior 2021 SFPD raid was irrelevant and should not have been considered. *Ex*
12 *parte* communications of this nature warrant an immediate reversal.
13

14 **E. Hearing Officer Lawrence was not impartial as required by law.**

15 The revocation order must be reversed because Hearing Officer Lawrence was not impartial.
16 When due process requires a hearing, an impartial adjudicator is a basic requirement: the *United*
17 *States Supreme Court* has stated that "*a fair trial in a fair tribunal is a basic requirement of due*
18 *process,*" and in the administrative context "*an impartial decision maker is essential.*" (*Absmeier v.*
19 *Simi Valley Unified Sch. Dist.* (2011) 196 Cal.App.4th 311; See also *Cal. Gov't.. Code §1425.10.*) In
20 addition to engaging in improper *ex parte* communications, Hearing Officer Lawrence's bias was
21 evidenced by her rude and disrespectful conduct toward appellants' counsel who did no more than
22 make evidentiary objections as any competent attorney would do. Hearing Officer Lawrence
23 scowled at counsel threatening to expel him from the hearing for objecting to the evidence and
24 mounting a zealous defense. Perhaps most egregiously, she outright refused to rule on appellants'
25
26
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28 ¹⁸ Ex.11: *Ex parte* communications between DPH staff and Hearing Officer Lawrence

¹⁹ *Ibid.*

1 pending evidentiary objections to the DPH evidence on grounds that the evidence was unreliable
2 and inaccurate, thereby denying appellants of a fair hearing with an impartial hearing officer, as
3 required by due process.²⁰
4

5 **F. Hearing Officer Lawrence unfairly truncated the time allotted for Ms.**
6 **Huang and Ms. Wang to present their defense.**

7 Further compounding the errors, Hearing Officer Lawrence impeded appellants' ability to
8 mount a fair defense, by failing to tell counsel ahead of time that appellants' 7-minute time allotted
9 to present a defense began when counsel cross-examined Sgt. Glenn during DPH's case-in-chief.
10 Thereafter, the appellants were only allowed three additional minutes to rush through the defense
11 case unfairly truncating their presentation instead of allotting appellants a fair opportunity to defend
12 against DPH's draconian enforcement action.
13

14 **G. DPH Failed to Provide an Adequate Recording and Transcript of the**
15 **Hearing**

16 Consistent with DPH's pattern of intentionally obstructing appellants' due process rights to
17 limit a meaningful appeal, DPH failed to properly record the hearing. The audio is inaudible in
18 portions and the video failed to capture the hearing officer who scowled and made faces at
19 appellants' counsel for the duration of the hearing.²¹ Moreover, DPH refused to provide an
20 adequate transcript of the proceedings, instead providing a document with crude captions or
21 snippets of the hearing that are virtually unusable.²² It is well-settled that an administrative decision
22 can be set aside if an agency fails to prepare an adequate record. (See eg. *Frase v Gourley (2000)*
23 *85 Cal.App.4th 762.*) In light of the cumulative errors in this matter, including failure to properly
24 record and transcribe the hearing, appellants request dismissal of the action.
25
26

27 ²⁰ Ex. 12: Appellants Evidentiary Objections to DPH Hearing Case Chronology and Exhibits dated 11/19/25.

28 ²¹ Ex. 9: Hearing Video

²² Ex. 13: DPH Transcript of Hearing

1 **H. Hearing Officer Lawrence failed to identify the basis for her ruling and the**
2 **evidence upon which she relied.**

3 Without question, the hearing order should be set aside because Hearing Officer Lawrence
4 failed to identify the basis of her decision to revoke appellants’ massage permit and did not
5 delineate the evidence she relied upon in making her decision.²³ In *Goldberg v Kelly, supra*, 397
6 U.S. 254, the Supreme Court described the due process requirements for administrative hearings.
7 Regarding the hearing order, the Court stated: “*The decisionmaker need not file a full opinion or*
8 *make formal findings of fact or conclusions of law, but should state the reason for [her]*
9 *determination and indicate the evidence [she] relied on.*” (*Ibid.*) Here, the hearing officer
10 completely failed to adhere to this principle which requires reversal because she gathered evidence
11 *ex parte* and failed to rule on appellants’ evidentiary objections. As a result, appellants have no idea
12 what evidence the hearing officer relied on in making her decision.
13

14 **II. The Matter Should Be Dismissed with Prejudice for Outrageous Government**
15 **Conduct to Deter Police Overtime Abuse and Inappropriate Non-Criminal**
16 **Investigations.**

17 Appellants also request a dismissal on due process grounds for outrageous government
18 conduct. It shocks the conscience that a sworn police officer would get naked and allow a masseuse
19 to massage his genitals with hot oil for a non-criminal, licensing issue to obtain overtime pay. This
20 constitutes not just an abuse of power, but police overtime abuse. SFPD contends it is short staffed
21 and it is nothing short of outrageous that tax dollars are spent investigating non-criminal conduct
22 that does not impact the health and well-being of the community nor protect public safety in such an
23 offensive and self-serving manner. Appellants wish to preserve the issue before the Board and will
24 brief this issue in full in the superior court should a writ be necessary to vindicate appellants’ rights.
25
26
27
28

²³

1 **Conclusion**

2 Due to the cumulative errors and apparent governmental malfeasance, traditional notions of
3 justice and fair play mandate that the Board reverse the Hearing Order and dismiss this matter with
4 prejudice to ensure that DPH and SFPD follow the law while enforcing it. DPH has a clear axe to
5 grind against Ms. Huang and Ms. Wang because they were exonerated at a prior hearing. They
6 threw out the rule book that typically should be applied, to unfairly target appellants and destroy
7 their lawful business. No evidence was presented that appellants knew that the masseuse engaged
8 in an act of solicitation and the only evidence against appellants comes from an overtime hungry
9 police officer with no credibility. As such, the Hearing Officer’s decision to revoke the permit was
10 arbitrary, capricious, and an abuse discretion and should be set aside forthwith.
11

12
13 DATED: March 5, 2026



14
15 _____
16 Paul V. Horcher
17 Attorneys for Appellants
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1 PAUL V. HORCHER, Esq. (SBN: 084882)
601 Van Ness Ave. #928, San Francisco, CA 94102-3257
2 Tel. 909-861-5555 | Fax. 415-301-4262 | Email: pvh831@gmail.com

3 Attorney for Appellants Jing Huang (“Ms. Huang”) and Liyan Wang (“Ms. Wang”)
4 DBA Richmond Serenity Spa (“the Spa”), 3446 Balboa Street

5 **SAN FRANCISCO BOARD OF APPEALS (“THE BOARD”)**

6 Jing Huang and Liyan Wang
7 DBA Richmond Serenity Spa,

Appeal No. 25-059

8 Respondent/Appellants,

**LIST OF EXHIBITS TO APPELLANTS’
BRIEF**

9 vs.

Hearing Date: March 25, 2026

10 San Francisco Department of Public Health,

11 Petitioner/Appellee.

	Pages
13 Ex. 1: DPH Hearing Officer Lawrence’s Revocation Order dated 11-20-25.	2-4
14 Ex. 2: Appellants’ Hearing Chronology and Hearing Exhibits A-K dated 11-12-25.	5-27
15 Ex. 3: Declaration of Jing Huang dated 11-11-25.	28-32
16 Ex. 4: SFPD Incident Report (“IR”) 250337568.	33-36
17 Ex. 5: First NOD dated 7-23-25.	37-38
18 Ex. 6: First Amended NOD dated 8-25-25.	39-40
19 Ex. 7: Second Amended NOD dated 8-27-25.	41-42
20 Ex. 8: Appellants’ pre-hearing requests for SFPD decoy recording and photograph.	43-45
21 Ex. 9: Hearing Video.	46
22 Ex. 10: Declaration of SFPD Lieutenant (Ret.) Raymond Kilroy.	47-49
23 Ex. 11: <i>Ex parte</i> communications between Hearing Officer Lawrence and DPH staff.	50-70
24 Ex. 12: Appellants’ Evidentiary objections to DPH Hearing Case Chronology & Exhibits.	71-76
25 Ex. 13: DPH’s Inferior “Transcript” of 11-20-25 Hearing.	77-116



Director's Hearing Order

Location Address 3446 Balboa Street	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa		
Property Owner Jing Huang		Phone 415-702-6468	Email richmondserenityspa@gmail.com	
Responsible Party or Parties Liyan Wang/Jing Huang	Attended Hearing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03

CODE SECTION(S) and DESCRIPTIONS
 SFHC Article 29.17(b) - Lewd Conduct and Prostitution Prohibited
 SFHC Article 29.31(f) - Practitioner Conduct

HEARING OFFICER DETERMINATIONS:
 After a full and fair consideration of the evidence and testimony received at the hearing on the above date, THE DIRECTOR FINDS AND DETERMINES THE FOLLOWING:

- That notice of the hearing has been duly given as required by law, and
- That your presence at the hearing is correctly designated above, and
- That the findings stated in the Inspection Report(s) are true, and

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That your Massage Establishment Health Permit #ME-120465 shall be revoked.
3. That business owners, Liyan Wang and Jing Huang, shall be ineligible for a Massage Business Permit for a period of five years from the date of permit revocation. This order applies solely to massage services and massage related activities. Nothing in this order prohibits the business owners from engaging in non-massage related services, provided such operations fully comply with all applicable laws and regulations and the prohibitions set forth in this order.

This Hearing Order continues on the next page.

IMPORTANT: Can you read this document? If not, we can have somebody help you read it. For free help, please call Department of Public Health at 415-252-3800.

请注意： 你是否理解信件的全部内容？如有任何问题,我们提供免费翻译服务,请致电三藩市公共卫生局 415-252-3800.

¿Puede leer este documento? Sí no puede, alguien lo puede ayudar. Para obtener ayuda gratis llame al Departamento de Salud Pública al (415) 252-3800.



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Director's Hearing Order (continued -- Page 2 of 3)

Responsible Party or Parties Liyang Wang/Jing Huang	Attended Hearing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03
Permit Number (if blank, this hearing did not involve a permit) ME - 120465	Permit Decision Revoke	Reinspection Fee Applies? <input type="checkbox"/> Yes as authorized by _____ <input checked="" type="checkbox"/> No		Reinspection Fee: n/a

4. That you shall pay the administrative penalty of \$7,500 for the occurrence of the violation as follows:
 SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.
 (A) Administrative fine: \$5,000 to be paid by Massage Establishment permittee

(12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises
 (A) Administrative fine: \$2,500 to be paid by Massage Business permittee, AND
 (B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit.

Should you have any questions, please contact:

Inspector Name: Ivy Phan	Inspector Phone 415-252-3986	Inspector Email ivy.phan@sfdph.org
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The aforementioned is a true copy of the orders issued in the name of the Director of Public Health in the City and County of San Francisco,

Hearing Officer Traci Lawrence	Hearing Officer Signature 	Date 12/19/25
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City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Director's Hearing Order (continued -- Page3 of3)

Responsible Party or Parties Liyang Wang/Jing Huang	Attended Hearing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03
Permit Number (if blank, this hearing did not involve a permit) ME - 120465	Permit Decision Revoke	Reinspection Fee Applies? <input type="checkbox"/> Yes as authorized by _____ <input checked="" type="checkbox"/> No		Reinspection Fee:

And Further, if checked, the following conditions are included in this order:

REINSPECTION FEE

That the Responsible Party named above pay the reinspection fee as authorized and shown above.

NUISANCE ABATEMENT

Failure to abate and remove the nuisance may result in the abatement of the nuisance by the Department of Public Health and the Property Owner shall become indebted to the City and County of San Francisco for the costs, charges, and fees incurred by reason of the abatement and removal of such nuisance upon demand.

COST RECOVERY

In accordance with the San Francisco Health Code, the Property Owner shall be indebted to the City and County of San Francisco for costs incurred in abating the effects of the violation, taking other remedial action, or imposing and collecting penalties, including but not limited to administrative costs, costs of issuing an order, inspection or monitoring costs, hearing officer costs, and reasonable attorney fees if sought by the Director in the Notice of Hearing. In any proceedings in which the Director seeks to recover attorney's fees, the prevailing party shall be entitled to reasonable attorney's fees. Failure to pay such costs, charges, and fees may result in a lien against the property.

APPEAL PROCESS if the case involves a Health Permit:

Within 15 days of receipt of this letter, you have the right to appeal this decision regarding your permit to the Board of Appeals. Appeals may be filed with the San Francisco Board of Appeals within 15 calendar days of the date of this notice. Appeals may be filed in-person (by appointment only), by phone ((628) 652-1150) or email (boardofappeals@sfgov.org). The Board's Office is located at 49 South Van Ness Avenue, Suite 1475. More information can be found on the Board's website at: <https://sf.gov/file-appeal-permit-or-decision>.

APPEAL PROCESS if the case involves a non-permitted facility and/or a penalty:

This Order is final and you may have the right to petition the Superior Court of San Francisco for judicial review or appropriate relief pursuant to Section 1094.6 of the California Code of Civil Procedures. The filing of a petition with the Superior Court shall not automatically stay the effectiveness of this Order or extend the time period in which you have to abate the violation

DPH USE ONLY

Decision Entry Date: 12/23/2025 Hearing Coordinator: ES
Initial

Should you have any questions, please contact:

Inspector Name: Ivy Phan	Inspector Phone 415-252-3986	Inspector Email ivy.phan@sfdph.org
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The aforementioned is a true copy of the orders issued in the name of the Director of Public Health in the City and County of San Francisco,

Hearing Officer Traci Lawrence	Hearing Officer Signature 	Date 12/19/25
-----------------------------------	-------------------------------	------------------

1 Paul V. Horcher, Esq. SBN 084882
2 601 Market St., #928 San Francisco CA 94102-3257
3 T: 909-861-5555 F: (415) 301-4262 E: pvh831@gmail.com"

4 Attorney for LIYAN WANG and JING HUANG dba RICHMOND SERENITY SPA CENTER

5 CITY AND COUNTY OF SAN FRANCISCO
6 DEPARTMENT OF PUBLIC HEALTH, ENVIRONMENTAL HEALTH SECTION
7 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103

8 SAN FRANCISCO DEPT OF PUBLIC HEALTH ("DPH")
9 vs.
10 JING HUANG ("Ms. Huang") and
11 LIYAN WANG ("Ms. Wang" dba
12 RICHMOND SERENITY SPA ("the Spa"),
13 3446 BALBOA ST.

Permit #M-120465

EXHIBITS FOR
JING HUANG and LIYAN WANG
RICHMOND SERENITY SPA

Hearing Date: November 20, 2025
Hearing Time: 1:00 p.m.
Hearing Place: 49 South Van Ness Ave.,
Room 192/194.

14 **EXHIBIT DESCRIPTION**

- 15 A *Annotated Chronology of Relevant Events* (2 pp).
- 16 B *Applicable Code Sections.*
- 17 C *Board of Barbering & Cosmetology Licensing* details for the Spa, Ms. Huang, & Ms. Wang (3 pp.).
- 18 D *07-12-21 Notice of Determination* that DPH sent to the Spa's 3443 Balboa St. Landlord.
- 19 E *The Spa's Website* – www.richmondserenityspa (6 pp.).
- 20 F *Certificate of Completion: Course for Prostitution – Prostitution Prevention Class* (Ms. Huang)
Certificate of Completion: Course for Prostitution – Prostitution Prevention Class (Ms. Wang).
- 21 G *07-25-25 Incident Report Request* to SFPD (Ref. #T017067-072525).
- 22 H *Counsel Paul Horcher's Public Records Act Request* to DPH: Massage opened 07-27-25.
- 23 I *Counsel Paul Horcher's Public Records Act Request* to DPH: Massage opened 10-07-25.
- 24 J *10-14-25 Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended NOD.*
- 25 K *11-10-25 Objection to and Request to Rescind Untimely and Inapposite Assertion of Official Information Privilege* (3pp.).

26 Dated: November 12, 2025.

Respectfully submitted,



Paul V. Horcher, Attorney for Jing Huang and
Liyang Wang dba Richmond Serenity Spa

ANNOTATED CHRONOLOGY OF RELEVANT EVENTS (1st of 2 pp.)

- 11-06-07 *The Board of Barbering & Cosmetology* ("the Board") issued Jing Huang ("Ms. Huang") *Esthetician Lic. #76542* (Exhibit C)
- 02-23-11 *The Board* issued Liyan Wang ("Ms. Wang") *Esthetician Lic. #93049* (Exhibit C).
- ~2011 Ms. Wang is certified by the *California Massage Therapy Council* ("CAMTC")
- ~ 2012 Ms. Huang is certified by the CAMTC (Certification is current).
- 03-25-15 Ms. Wang and Ms. Huang ("the owners") filed fictitious name statement for *Richmond Serenity Spa* ("the Spa") then located at 3443 Balboa Street; DPH Permit issued in 2016.
- 03-16-20 The Spa is **CLOSED** (boarded and posted) by **COVID-19 City order** until 09-14-20.
- 09-14-20 The Spa is **RE-OPENED** by **COVID-19 City order**.
- 12-04-20 The Spa is **CLOSED** (boarded and posted) by **COVID-19 City order** until 01-27-21.
- 01-27-21 The Spa is **RE-OPENED** again by **COVID-19 City order**.
- 05-06-21 Lead by SFPD Inspector Antonio Flores, 10 armed Officers on a "cash raid" aka overtime raid, some with guns drawn, invaded the tiny Spa. No one was arrested. They lingered at the Spa for nearly four hours joking and discussing where to eat.
- 07-07-21 DPH issued Ms. Wang and Ms. Huang a *Notice of Determination* ("NOD") like the 2025 NOD alleging lewd conduct.
- 07-12-21 DPH prematurely sent an officiously intermeddling NOD to intimidate the owners' then landlord, John Lam. (Exhibit D)
- 02-17-22 Independent Hearing Officer Tinetta Thompson entered decision determining the owners' non-liability for the DPH NOD.
- 04-18-23 With her life savings, Ms. Huang bought 3446 Balboa St., #1 San Francisco CA 94121 ("the premises") for \$575,000.00.
- 05-17-23 DPH accepted the owners' *Application for a DPH Permit to Operate a Massage Establishment* at 3446 Balboa St.
- 05-26-23 *The Board* issues *Cosmetology Establishment License 354658* to the Spa; license remains in good standing. (Exhibit C)
- 06-01-25 Effective date of the owners' 5-year lease of the Spa from Ms. Huang (signed 05-16-25).
- 01-08-24 After the owners spent ~\$70,000 for interior improvements and 6 months dealing with San Francisco bureaucracies, DPH inspected the premises and finally issued *Massage Establishment Permit No. ME-120465* to the owners.
- 01-27-24 The Spa officially (re-)opened at 3446 Balboa Street.
- 09-05-24 DPH inspected the Spa – "*overall sanitation is adequate*" This is the last Inspection until 07-16-25, over 10 months later.
- 06-17-25 SFPD's ~4-member team began a "*buy walk*" decoy operation at 4:00 pm (source: incident report) at the Spa. The SFPD undercover officer ("decoy") has a checkered history¹ and he and his SVU boss, Anthony Flores, both seem very fond of overtime² which usually begins at 4:00 p.m. Although the time at the Spa was very brief, the report took 3 hours! The Decoy noted recordings and photos on a Scan disk in the Incident Report – but they are still unreceived by the owners despite multiple *Public Records Act* requests! (Exhibits H and I)

¹ The decoy and three other SFPD officers failed to find a loaded gun allowing a kidnapping suspect to bring it into the jail (Source: <https://sfstandard.com/2022/08/02/a-kidnapping-suspect-brought-a-loaded-gun-to-jail-officials-blame-sf-police-for-failing-to-find-it/>) and the SFPD Chief suspended the decoy for 4 days for an unlawful search (Source: [https://sb1421publicarchive-sanfranciscopd.govqa.us/WEBAPP/rs/\(S\(kpivk1bg4voedf2r5usi0rvn\)\)/RequestArchiveDetails.aspx?rid=176231&view=45](https://sb1421publicarchive-sanfranciscopd.govqa.us/WEBAPP/rs/(S(kpivk1bg4voedf2r5usi0rvn))/RequestArchiveDetails.aspx?rid=176231&view=45))

² In 2023 the SFPD Sergeant 3 decoy was paid total benefits of \$435,602.89 of which \$178,592.13 was regular pay and \$180,526.08 in overtime and his boss, Inspector 3 Antonio Flores, was paid total benefits of \$454,505.36 of which \$196,139.73 was regular pay and \$139,975.53 in overtime. (Source: www.transparentcalifornia.com). Flores' overtime pay has more than doubled over the past decade, peaking at more than \$160,000 in the last fiscal year (Source: https://sfstandard.com/2025/09/30/sfpd-svu-historic-staffing-lows-longest-detective/?utm_campaign=daily&utm_medium=email&utm_source=sfs_newsletter&utm_term=09_30_25). San Francisco Standard (09-30-25).

EXHIBIT A

ANNOTATED CHRONOLOGY OF RELEVANT EVENTS (2nd of 2 pp.)

- 07-16-25 DPH inspected the premises and noted, *inter alia*, in *Notice of Violation Inspection Report* ("NOV") that "Restroom is adequately stocked. All massage tables are in good, sanitary condition. Overall sanitation is adequate." After delaying a month, DPH finally notified Ms. Wang of "SFPD's buy walk operation on 06/17/2025" but intentionally failed to provide her with a copy of the related SFPD incident Report obviously in their possession (DPH quoted selected passages from it and identified it as *Incident Report #250337568* ("the incident report")), but told her to "...reach out to SFPD for a copy on the incident report" which proved to be a time-wasting misdirection.
- 07-18-25 The Owners re-engaged attorney Paul V. Horcher ("Counsel")
- 07-23-25 DPH issued **first NOD** alleging violations of SFHC §§29.17(b) & 29.31(f); **DPH orders the Owners to pay a \$7,500.00 fine but does not request the suspension or revocation of the owners' massage establishment permit.**
- 07-25-25 Counsel requested the incident report from SFPD (Ref #T017067-072525). (Exhibit G)
- 07-27-25 Counsel filed *Public Records Act Request #25-5567* for the incident report, photo & recordings etc. from DPH. (Exhibit H)
- 08-04-25 DPH produced documents in response to *Request #25-5567* but excluded the incident report, photos, and recordings.
- 08-05-25 SFPD disapproved the Owners' request for *SFPD Incident Report 250337568* (SFPD) etc.
- 08-06-25 Counsel submitted timely *Director's Hearing Request* signed by the Owners to DPH and informed DPH that the Owners could not prepare for a hearing without a copy of the incident report.
- 08-12-25 **DPH finally produced the incident report** lamely representing, without an apology, "We were under the impression that SFPD had to the one to provide the report..." The report revealed the identity of undercover agent aka decoy.
- 08-13-25 DPH represented that "...DPH is not in possession of the photo or video mentioned in the incident report."
- 08-25-25 **DPH issued an Amended NOD for the Spa**; this time **materially escalating the punishment** to order the owners to "**pay the administrative fine of \$7,500 and permit penalty of 60 days**" <sic> for violating SFHC §§29.17(b) & 29.31(f)." Counsel noted the 60 days penalty and requested a later Hearing date to allow adequate preparation time.
- 08-27-25 **Apparently reacting in a pique to the request for a later Hearing date**, Jennifer Callewaert, Acting Director of Environmental Health, **again escalates the ordered penalties even further**. She now demanded **\$7,500.00 in fines and permit revocation** as proscribed by "SFHC §§ 29.45(a)(3)" and "(4)." However, SFHC §§ 29.45(a)(4) is for "*Trafficking Charges or Convictions, as Defined by California Penal Code Section 236.1*" heretofore missing from her previous NODS!
- 09-02-25 Counsel requested DPH to reveal the basis of the finding, if any, for the sudden demand for permit revocation. DPH responded that there were no new findings – just that DPH latently discovered that it had the authority so did so.
- 10-07-25 *Public Records Record request #25-7799* for post 08-04-25 records submitted to DPH (Exhibit I).
- 10-14-25 After counsel's latent discovery of the 08-27-25 SFHC §§ 29.45(a)(4) *Human Trafficking* finding by Acting Dir. Callewaert, he requested that the (2nd) *Amended NOD* be further appropriately revised and the hearing be re-noticed and scheduled for a date the following month or later, consistent with ¶¶ 5 and 7 of the *DPH Director's Hearing Procedures* (Exhibit J).
- 10-29-25 In response to Counsel's Public Records Act Request, DPH released "**REDACTED RR #25-7799...**" **that again revealed to counsel and to the public the identity of the undercover agent aka decoy.**
- 11-04-25 DPH employee Douglas Obana ("DPH Inspector Obana") represented that DPH briefings are due 14 days in advance of the 11-20-25 hearing and 7 days in advance for the operator. This means that DPH's briefings were due on Thursday, 11-06-25.
- 11-07-25 At 11:27 p.m., DPH Inspector Obana named the new Hearing Officer, Traci Lawrence, to replace the previously named Hearing Officer who had undisclosed employment time of 6.5 years with DPH. He also sent untimely attachments described as briefing from the DPH-Massage Program entitled *Assertion of Official Information Privilege* dated 11-06-25 ("*brief*") and *Declaration of Michelle Vega in Support of the City's Assertion of the Official Information Privilege* dated 11-06-25 ("*declaration*").
- 11-10-25 Counsel replied to the untimely *brief* and erroneous *declaration* with his *Objection to and Request to Rescind Untimely and Inapposite Assertion of Official Information Privilege* (Exhibit K).

EXHIBIT A

RELEVANT CODE SECTIONS

California Business & Professions Code §4603.1 **Local governments shall impose and enforce only reasonable and necessary fees and regulations on massage businesses and massage establishments,** in keeping with the requirements of existing law and being mindful of the need to protect legitimate business owners and massage professionals, particularly sole providers. (emphasis added)

The United States Supreme Court ruled in *Goldberg v. Kelly*, 397 U.S. 254 (1970), the seminal case concerning due process in administrative law cases, that:

"A pre-termination evidentiary hearing is necessary to provide the welfare recipient with procedural due process. (a) Such hearing need not take the form of a judicial or quasi-judicial trial, but the recipient must be provided with timely and adequate notice detailing the reasons for termination, and an effective opportunity to defend by confronting adverse witnesses and by presenting his own arguments and evidence orally before the decisionmaker. (b) Counsel need not be furnished at the pre-termination hearing, but the recipient must be allowed to retain an attorney if he so desires. (c) The decisionmaker need not file a full opinion or make formal findings of fact or conclusions of law, but should state the reason for his determination and indicate the evidence he relied on. (d) The decisionmaker must be impartial, and, although prior involvement in some aspects of a case will not necessarily bar a welfare official from acting as decisionmaker, he should not have participated in making the determination under review."

SEC. 29.17. MASSAGE PRACTITIONER CONDUCT REQUIREMENTS...(b) Lewd Conduct and Prostitution Prohibited.

Consistent with California Penal Code Section 647, as may be amended, and San Francisco Police Code Section 225, as may be amended, Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.

SEC. 29.31. OPERATING REQUIREMENTS. Massage Establishments, Sole Practitioner Massage Establishments, and Outcall Massage Services must comply with the following operating requirements to the extent applicable:... (f) Practitioner Conduct. Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

SEC. 29.45. VIOLATIONS AND ADMINISTRATIVE PENALTIES. (a) Any person who violates any provision of this Article 29 or any rule or regulation adopted pursuant to Section 29.2 may, after being provided notice and an opportunity to be heard, be subject to the following monetary and permit penalties. The Director may impose administrative fines and/or permit penalties that exceed those listed in this Section 29.45 where the Director finds that such higher fines and/or penalties are necessary or appropriate to protect and promote the health and well-being of a Massage Business' employees, customers, and/or neighbors...

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as Defined by California Penal Code Section 647(a) or (b) and/or San Francisco Police Code Section 225, for Anyone Working at Massage Establishment.

- (A) Administrative fine: \$5,000 to be paid by Massage Establishment permittee; and
- (B) Permit penalty: Mandatory 60-120 days suspension of Massage Establishment permit.
- (C) Repeat violations: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location for a period of two years.

(4) Trafficking Charges or Convictions, as Defined by California Penal Code Section 236.1, for Anyone Working at Massage Establishment.

- (A) Administrative fine: None.
- (B) Permit penalty: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location.
- (C) Repeat violations: Same penalty as (a)(4)(B).

(12) Anyone Engaged In Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises.

- (A) Administrative fine: \$2,500 to be paid by Massage Business permittee, and
- (B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit. Permit holder ineligible for subsequent Massage Practitioner or Massage Business Permit for a period of five years from the date of permit revocation.

EXHIBIT B

**BOARD OF BARBERING
AND COSMETOLOGY
LICENSING DETAILS FOR:
76542**

NAME: HUANG, JING

LICENSE TYPE: ESTHETICIAN

PRIMARY STATUS: CURRENT

ADDRESS NOT DISCLOSED

ISSUANCE DATE

NOVEMBER 6, 2007

EXPIRATION DATE

NOVEMBER 30, 2025

CURRENT DATE / TIME

OCTOBER 4, 2025
1:42:24 PM

LICENSE RELATIONSHIPS

OWNER (LICENSED)

LICENSE/REGISTRATION ROLE:
OWNER

RELATED PARTY ROLE:
ESTABLISHMENT/MOBILE
UNIT/SCHOOL

NAME: RICHMOND SERENITY
SPA

LICENSE/REGISTRATION TYPE:
ESTABLISHMENT

LICENSE NUMBER: 354658
PRIMARY STATUS: CURRENT

ADDRESS :
3446 BALBOA ST
SAN FRANCISCO CA 94121-
2702
SAN FRANCISCO COUNTY
MAP

**BOARD OF BARBERING
AND COSMETOLOGY
LICENSING DETAILS FOR:
93049**

NAME: WANG, LIYAN

LICENSE TYPE: ESTHETICIAN

PRIMARY STATUS: CURRENT

ADDRESS NOT DISCLOSED

ISSUANCE DATE

FEBRUARY 23, 2011

EXPIRATION DATE

FEBRUARY 28, 2027

CURRENT DATE / TIME

OCTOBER 4, 2025
1:41:38 PM

LICENSE RELATIONSHIPS

OWNER (LICENSED)

LICENSE/REGISTRATION ROLE:

OWNER

RELATED PARTY ROLE:

ESTABLISHMENT/MOBILE
UNIT/SCHOOL

NAME: RICHMOND SERENITY
SPA

LICENSE/REGISTRATION TYPE:

ESTABLISHMENT

LICENSE NUMBER: 354658

PRIMARY STATUS: CURRENT

ADDRESS :

3446 BALBOA ST
SAN FRANCISCO CA 94121-
2702
SAN FRANCISCO COUNTY
MAP

**BOARD OF BARBERING
AND COSMETOLOGY
LICENSING DETAILS FOR:
354658**

NAME: RICHMOND SERENITY SPA

LICENSE TYPE: ESTABLISHMENT

PRIMARY STATUS: CURRENT

ADDRESS OF RECORD

3446 BALBOA ST
SAN FRANCISCO CA 94121-2702
SAN FRANCISCO COUNTY

ISSUANCE DATE

MAY 26, 2023

EXPIRATION DATE

MAY 31, 2027

CURRENT DATE / TIME

OCTOBER 4, 2025
1:34:47 PM

LICENSE RELATIONSHIPS

OWNER (LICENSED)

LICENSE/REGISTRATION ROLE: ADDRESS NOT DISCLOSED
ESTABLISHMENT/MOBILE
UNIT/SCHOOL

RELATED PARTY ROLE:
OWNER

NAME: WANG, LIYAN

LICENSE/REGISTRATION TYPE:
ESTHETICIAN

LICENSE NUMBER: 93049

PRIMARY STATUS: CURRENT

OWNER (LICENSED)

LICENSE/REGISTRATION ROLE: ADDRESS NOT DISCLOSED
ESTABLISHMENT/MOBILE
UNIT/SCHOOL

RELATED PARTY ROLE:
OWNER

NAME: HUANG, JING

LICENSE/REGISTRATION TYPE:
ESTHETICIAN

LICENSE NUMBER: 76542

PRIMARY STATUS: CURRENT



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

London N. Breed, Mayor
Grant Colfax, MD, Director of Health
Patrick Fosdahl, MS REHS
Acting Director of Environmental Health

July 12, 2021

JOHN LOY LAM REVOCABLE TRUST



RE: Notice of Determination – Richmond Serenity Spa – 3443 Balboa Street, San Francisco

Dear John Loy Lam Revocable Trust:

As the owner on record of the above-referenced property, you are hereby notified that Massage Business permit holders, Liyan Wang and Jing Huang "Owner", of Richmond Serenity Spa located at 3443 Balboa Street in San Francisco, "The Establishment", is in violation of the provision(s) of the San Francisco Health Code, Article 29, which were observed and documented on the May 5, 2021 San Francisco Police Department Incident Report ("Incident Report") and outlined in the Notice of Violation Inspection Report dated June 30, 2021. Please see the attached Owner and Practitioner Notice of Determinations for specific details.

The Owner of the Establishment is subject to administrative penalties and health permit revocation.

The Massage Practitioner identified as conducting the violation within the Establishment is subject to health permit revocation.

Please be advised that under California law, property owners can be held responsible for certain unlawful activities, conditions, and uses of their property. Among other laws, the Red Light Abatement Law, California Penal Code Sections 11225 – 11235, provides that the owner of property used for "lewdness, assignation, or prostitution" may be made subject to an injunction ordering closure of the property for one year, a financial penalty of \$25,000, and attorneys' fees. Furthermore, under the San Francisco Planning Code an owner may be subject to an injunction, financial penalties, and attorneys' fees for any condition or use of property that violates any Conditional Use Permit or other provision of the San Francisco Planning Code.

If you have any questions, please feel free to contact me, at Jennifer.callewaert@sfdph.org or 415-252-3971.

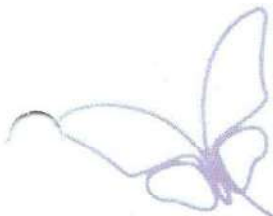
Sincerely,

Jennifer Callewaert, Principal Environmental Health Inspector
Massage & Body Art Program
Environmental Health Branch
San Francisco Department of Public Health

CC: Peter Keith, Chief Attorney, Neighborhood and Residential Safety Division, Office of the City Attorney
Dario Jones, Enforcement Planner, San Francisco Planning Department

MASSAGE PROGRAM
49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103
Phone 415-252-3882 | Fax 415-252-3842

EXHIBIT D



Richmond Serenity Spa

Special Offers

At Richmond Serenity Spa we believe that the spa experience shouldn't be just for special occasions.



NEW CLIENT SPECIAL

Let your friends know, it's 20% off their first session!



EARLY BIRD SPECIAL

Come in before noon and enjoy \$10 off for facial or massage!



LADIES AND COUPLES SPECIAL

Weekends get \$15 off each for facial or massage!



PRE-PAY DISCOUNT

After your session, if you pre-pay your next appointment, receive \$10 off (\$20 for couples massage).

EXHIBIT E

Relax, rejuvenate, repeat.

Richmond Serenity Spa is designed with YOU in mind.

A luxury experience right in the neighborhood

Our special discounts make the experience affordable

A relaxing environment puts you at ease

Our friendly and professional staff keeps you coming back

An oasis of relaxation, right in the neighborhood!

Sometimes you want to drive across town to a destination spa. Sometimes you want the oasis to be within reach, friendly and affordable.



REJUVENATION



Facials

RELAXATION

EXHIBIT E



Massage

BEAUTY

Waxing



PAMPERING

Scrub

A neighborhood spa — with a difference

We've paid attention to all the little things that make you happy, because at the end of the day it's all about the details.

EXHIBIT E



NEWLY RENOVATED INTERIOR

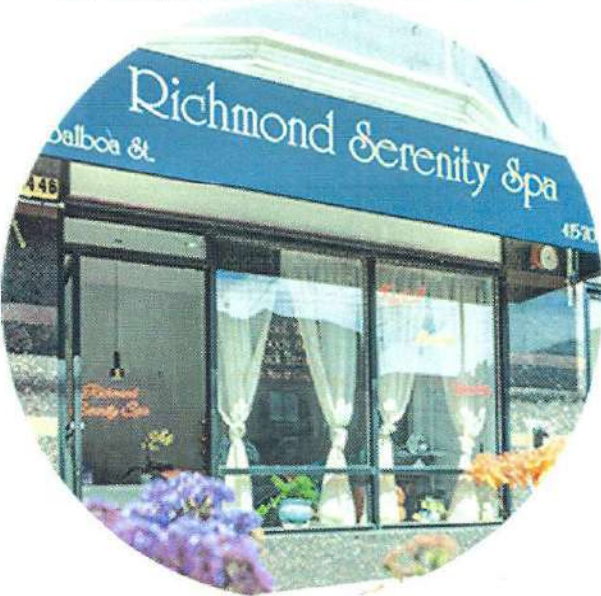


EXHIBIT E

COMFORTABLE WAITING AREA



UPGRADED SHOWER ROOM



EASY PARKING

Prices

- **Massage**

- Aroma is \$10 extra (included in Couples price).
- - Swedish (30/45/60 minutes) \$50/\$70/\$85
 - Deep tissue (30/45/60 minutes) \$55/\$80/\$95
 - Couples Swedish (60 minutes) \$180
 - Couples Deep Tissue (60 minutes) \$200
 - Scrub (20 minutes) \$50

- **Facials**

- - European Traditional Facial (50 minutes) \$80
 - Serenity Signature Facial (60 minutes) \$90
 - Revitalizing Collagen Facial (70 minutes) \$110
 - Youth Renewing Facial (70 minutes) \$120
 - Men's Facial (60 minutes) \$90

- **Waxing**

- - Lips/Chin Waxing \$20
 - Eyebrow \$30
 - Arms \$60+
 - Full legs \$70+
 - Back \$70+



**Richmond
Serenity Spa**

Relax, rejuvenate, repeat.

Our Location 3446 Balboa Street, San Francisco, CA 94121 richmondserenityspa@gmail.com (415) 702-6468

EXHIBIT E

Certificate of Completion

This certifies that the person named below has completed a
4 Hour Prostitution Prevention Class

**COURSE FOR PROSTITUTION
PROSTITUTION PREVENTION CLASS**

Jing Huang

31 Saint Charles Ave, San Francisco, CA 94132

Date of Birth: 05/19/1964

Date of Course Completion: 10/10/2025

Certificate Number: 1585283



Mr. Robert A. Williams, Course Instructor
(888) 338-8855 | certificate@courseforprostitution.com



Verify the authenticity of this certificate by
visiting: NA Learning.org/Verify

EXHIBIT F

Certificate of Completion

This certifies that the person named below has completed a
4 Hour Prostitution Prevention Class

COURSE FOR PROSTITUTION
PROSTITUTION PREVENTION CLASS

Liyan Wang

2 Shawnee Ave, San Francisco, CA 94112

Date of Birth: 05/10/1976

Date of Course Completion: 10/12/2025

Certificate Number: 1586304



Mr. Robert A. Williams, Course Instructor
(888) 338-8855 | certificate@courseforprostitution.com



Verify the authenticity of this certificate by
visiting: NAlearning.org/Verify

EXHIBIT F

Incident Report Request

Reference No: T017067-072525

Contact E-Mail: pvh831@gmail.com

The San Francisco Police Department has received your request for Incident Report Number 250337568. If an incident report of 9-digit case number was not provided, there will be a delay in processing, as your request will need to be researched by CISU staff.

Your request was received on 7/25/2025 and given the reference number T017067-072525 for tracking purposes. Your request will be processed in the order it was received. If applicable, your request will be expedited pursuant to the statutory guidelines.

Under CA Family Code § 6228, incident reports requested by a victim or his or her representative for the alleged crimes of domestic violence, sexual assault, stalking, human trafficking, and abuse of an elder or dependent adult are entitled to receive copies within five (5) working days of the request, unless good cause for delay exists. If good cause exists, reports shall be released no later than ten (10) working days after the request is made.

Your report is available for processing upon ID verification. Please send us a copy of your Valid Identification (any current ID, including a valid driver's license, SF City ID card, a State-Issued ID card or a Passport (originating country Ok). Your request will be processed upon receipt.

If you prefer to pick up your report in person, please come to Police Headquarters, 1245 3rd St., during business hours, Monday – Friday, except Holidays, 8:00AM - 5:00 PM. You can contact our office for an appointment, but it is not necessary.

To monitor the progress or updated status of this request please log into the SFPD Public Records Center.

Thank you,

San Francisco Police Department
Crime Information Services Unit
1245 3rd Street, First Floor
San Francisco, CA 94158
415-575-7232

Counter Operating Hours:
Monday – Friday 8:00 am to 5:00 pm, except Holidays
Closed weekends and evenings

EXHIBIT G

Skip to main content

City and County of San Francisco

NextRequest

Request Visibility: Published

Request 25-5567 Closed



1 of 1 with filters active

Dates

Received
July 27, 2025 via web

Requester

Paul Horcher

pvh831@gmail.com

601 Van Ness Ave, #928, San Francisco, CA, 94102

909-861-5555

Law Offices of Paul V. Horcher

Staff assigned

Departments

Public Health: Massage

Point of contact

Bernard Chan

Request

All files from **January 1, 2023** to the present, associated with **3446 Balboa St.** (aka 3448-1 Balboa Street), San Francisco CA 94121, APN Sequence 1, Lot 041 Block 1578 (**known as Richmond Serenity Spa owned by Jing Huang**) - including, but not limited to, all documents, massage establishment applications, massage inspection reports, SFPD Incident Reports, stipulations, hearing notices, intra-agency communications, inter-agency communications such as with Planning (PDSF) and Building Inspection (SFDBI), all BPA's, etc., photos, emails, text messages, videos, data, other records, and all audio and/or video recordings, BWC recordings, CD's and/or DVD's, MP4's etc.

Show less

Timeline Documents

Request published Anyone with access to this request

August 4, 2025, 9:45am by Staff

Request closed Anyone with access to this request

The Department of Public Health has conducted a diligent search for records responsive to your request. We have located responsive records, which are available to you here. This concludes your public records request.

August 4, 2025, 9:45am by Staff

Document(s) released to requester Requester + Staff

RR 25-5567 - 3446 Balboa Street - Richmond Serenity Spa.pdf

August 4, 2025, 9:44am by Staff

Department assignment Anyone with access to this request

Public Health: Massage

July 27, 2025, 3:27pm by the requester

Request opened Anyone with access to this request

Request received via web

July 27, 2025, 3:27pm by the requester

[FAQS](#)
[Help](#)
[Privacy](#)
[Terms](#)

CIVICPLUS
NextRequest
EXHIBIT H

Skip to main content

City and County of San Francisco

NextRequest

Request Visibility: Published

Request 25-7799 Open



1 of 1 with filters active

Dates


Received


October 07, 2025 via web


Requester

 Paul Horcher

 pvh831@gmail.com

 601 Van Ness Ave, #928, San Francisco , CA, 94102

 909-861-5555

 Law Offices of Paul V. Horcher

Request

All files from **August 4, 2025** to the present, associated with **3446 Balboa St.** (aka 3448-1 Balboa Street), San Francisco CA 94121, APN Sequence 1, Lot 041 Block 1578 (**known as Richmond Serenity Spa owned by Jing Huang**) - including, but not limited to, all documents, massage establishment applications, massage inspection reports, SFPD Incident Reports, stipulations, hearing notices, intra-agency communications, inter-agency communications such as with Planning (PDSF) , Building Inspection (SFDBI), San Francisco Police Dept. (SFPD), California Massage Therapy Council (CAMTC), all BPA's, etc., photos, emails, text messages, videos, data, other records, and all audio and/or video recordings, BWC recordings, CD's and/or DVD's, MP4's etc.

Show less

Staff assigned

Departments

Public Health: Massage

Point of contact

Bernard Chan

Timeline

Documents

 **Department assignment** Anyone with access to this request

Public Health: Massage

October 7, 2025, 4:31 pm by the requester

 **Request opened** Anyone with access to this request

Request received via web

October 7, 2025, 4:31 pm by the requester

FAQS

Help

Privacy

EXHIBIT I

 CIVICPLUS
NextRequest

PAUL V. HORCHER, *Attorney at Law*
601 Van Ness Ave., #928, San Francisco CA 94102-3257
Tel: (909) 861-5555 Fax: (415) 301-4262 Email: "pvh831@gmail.com"

October 14, 2025

via email

Jennifer Callewaert, Acting Director of Environmental Health
San Francisco Dept. of Public Health ("DPH")
49 S. Van Ness Ave, Suite 600
San Francisco CA 94103

Re: **Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended Notice of Determination (NOD).**
DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa St. #1, San Francisco CA 94121

Dear Acting Director Callewaert:

It has come to light that the subject notice appears to be materially and fatally at variance with both your original *NOD* and *1st amended NOD* in that, in addition to the escalating unwarranted and draconian permit revocation and financial penalties, you are also ordering my clients to pay a \$2,500.00 administrative penalty for occurrence of the alleged violation as proscribed by *San Francisco Health Code ("SFHC")* "**§29.45(a)(4)**," (emphasis added) the *SFHC* § that your Order cited.

It is important to clarify that *SFHC* §29.45(a)(4) is irrelevant and **does not** authorize the imposition of an administrative fine.

The text of the section is as follows:

"(4) Trafficking Charges or Convictions, as Defined by California Penal Code Section 236.1, for Anyone Working at Massage Establishment.

- (A) *Administrative fine: None.* (emphasis added).
- (B) *Permit penalty: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location.*
- (C) *Repeat violations: Same penalty as (a)(4)(B).*"

In 2021, an SFPD search warrant affidavit reprehensibly and falsely alleged human trafficking felonies at the Spa when it was located at 3443 Balboa St. Now, in 2025, my clients, Jing Huang and Liyan Wang, are deeply distressed that your (2nd) *Amended NOD Order* is now repeating the discredited 2021 SFPD falsehoods by categorizing them as felonious human traffickers—a serious accusation of a loathsome crime punished by serious state prison time, when, in fact, neither has been suspected, charged, or convicted of such a heinous crime.

This letter serves as a formal courtesy notification. If the (2nd) *Amended NOD* is not dropped entirely or further appropriately amended again and the hearing appropriately re-noticed and scheduled for a date next month or later, consistent with §§ 5 and 7 of the *DPH Director's Hearing Procedures* and my clients' procedural due process rights, they will be compelled to pursue a motion to dismiss with prejudice the entire defective 08-27-25 (2nd) *Amended NOD*, *inter alia*.

Thank you for your anticipated cooperation.



Paul V. Horcher, Attorney for Jing Huang and Liyan Wang

cc: Clients, interested parties.

EXHIBIT J

November 10, 2025

via email

Jennifer Callewaert, Acting Director of Environmental Health
San Francisco Dept. of Public Health ("DPH")
49 S. Van Ness Ave, Suite 600
San Francisco CA 94103

Re: *DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa*, 3446 Balboa St., San Francisco CA 94121
Objection to Untimely and Inapposite Assertion of Official Information Privilege; Request to Rescind

Dear Acting Director Callewaert:

I represent Richmond Serenity Spa owned by Li Yan Wang and Jing Huang in defending against this 2025 DPH Permit Revocation Action and represented them four (4) years ago in 2021 defending DPH's first Permit Revocation Action.

On November 4, 2025, at 2:56 PM, I received the following email from DPH employee Douglas Obana, MPH, REHS, Principal Environmental Health Inspector ("DPH Inspector Obana") with representations of the parties' respective deadlines:

"Hello Everyone,

*Given the conflict with December 2nd, we have made arangments <sic> with a new hearing officer for the original date of November 20th at 1pm since that worked with everyone initially. Briefings are still due with the same timeline. **Department briefings <sic> due 14 days in advance of the hearing** and 7 days in advance for the operator. Please let me know if anyone has and <sic> questions and have a great day. (emphasis added)*

Sincerely, Douglas Obana, MPH, REHS. (emphasis added)

*Principal Environmental Health Inspector Water Program Environmental Health Branch Population Health Division
San Francisco Department of Public Health 49 South Van Ness Ave, Suite 600 San Francisco CA, 94103 415-252-3993"*

The Hearing date is November 20, 2025, which means that the DPH's briefings were due on Thursday, November 6, 2025.

Last Friday night, November 7, 2025 at **11:27 p.m.**, DPH Inspector Obana emailed me an update on the identity of the new Hearing Officer with attachments described as a briefing from the DPH-Massage Program entitled *Assertion of Official Information Privilege* dated November 6, 2015 ("the brief") and *Declaration of Michelle Vega in Support of the City's Assertion of the Official Information Privilege* also dated November 6, 2025 ("the declaration"), respectively.

The untimely brief and the declaration are riddled with factual and legal errors as well as untruths.

The brief quotes *California Evidence Code §1040(b)(2)* to assert the official information privilege but ignores the threshold requirements of *§1040 (a)*, to wit:

*"(a) As used in this section, 'official information' means information acquired in confidence by a public employee in the course of his or her duty **and not open, or officially disclosed, to the public prior to the time the claim of privilege is made.**" (emphasis added).*

The official information, the agent's identity, was officially disclosed, nearly three (3) months ago by DPH Code Enforcement Investigator Ivy Phan on August 12, 2025, when she unconditionally transmitted to me a partially redacted *SFPD Incident Report No. 250337568* with the name of the undercover agent **not** redacted. She also sent emails to her work colleagues, Ivy Phan, and Danny Lee, as well as to you, their boss. DPH released the same report to me and the public with emails shared with the named undercover agent as "*REDACTED RR #25-7799...*" on October 29, 2025.

Nonetheless, the brief further states the untruth "**The agent's identity has remained confidential, and the City has taken deliberate measures to preserve that confidentiality.** See *Vera Decl.*" (emphasis added)

Then the Brief states:

"The City does not intend to call the agent to testify live. Instead, the City intends to submit an incident report and declaration, which together provide a sufficient evidentiary basis for an administrative action. Petitioners retain the opportunity to challenge the substance and credibility of the agent's account through the administrative process."

In other words, the City does not intend to allow my clients their procedural due process right to effectively (cross-) examine and confront the undercover agent – a violation of the ruling of the *U. S. Supreme Court* case of *Goldberg v. Kelly*, 397 U.S. 254 (1970), the seminal case concerning due process in administrative law cases, that states::

*"A pre-termination evidentiary hearing is necessary to provide the welfare recipient with procedural due process. (a) Such hearing need not take the form of a judicial or quasi-judicial trial, but **the recipient must be provided with timely and adequate notice detailing the reasons for termination, and an effective opportunity to defend by confronting adverse witnesses** and by presenting his own arguments and evidence orally before the decisionmaker. (b) Counsel need not be furnished at the pre-termination hearing, but the recipient must be allowed to retain an attorney if he so desires. (c) The decisionmaker need not file a full opinion or make formal findings of fact or conclusions of law, but should state the reason for his determination and indicate the evidence he relied on. (d) The decisionmaker must be impartial, and, although prior involvement in some aspects of a case will not necessarily bar a welfare official from acting as decisionmaker, he should not have participated in making the determination under review."* (emphasis added)

My clients hereby formally request that the undercover agent be produced at the Hearing for their examination.

The brief goes on to take a speculative and contemptible personal attack towards me, my clients' counsel, speculating that I would likely share and disclose the agent's identity to my other clients.

Finally, the brief disingenuously states:

"The petitioners' due process rights are fully protected through access to the agent's written statements and the opportunity to challenge the evidence under protective conditions."

Absolute nonsense. My clients' due process rights are only fully protected by the unrestricted exercise of their right to a face-to-face confrontation of the undercover agent.

Like DPH Inspector Obana and you, the declarant Michelle Vega, is a *Registered Environment Health Specialist* ("REHS"); she adds the REHS acronym to her name in her emails. REHS's are subject to discipline pursuant to *California Code, Health and Safety Code - HSC § 106715(a)(4)* which reads as follows with emphasis added:

*(a) Notwithstanding any other provisions of this article, the department upon the recommendation of the committee may suspend, deny, refuse to renew, or revoke a registration certificate issued under this article after sufficient notice and an opportunity for a hearing and upon findings that the registered environmental health specialist has done any of the following:...(4) **Committed an act of deceit, misrepresentation, violation of contract, fraud, negligence, professional incompetence, or unethical practice.**"* (emphasis added).

The declaration was apparently a rush job in that there are two paragraph "2.'s," it contains statements that appear to be deceitful, misrepresent the facts, and are unethical as follows:

Ms. Vega stated in the first ¶2 of the declaration:

*"2. In my official capacity, I have access to records and information generated or collected by EHB in the course of its enforcement activities. The material at issue in this matter, specifically, information that would reveal the physical appearance and identity of an undercover agent, **has been maintained as confidential at all times.**"* (emphasis added)

The identity of the undercover agent has **not** been maintained as confidential since it was officially disclosed, nearly three (3) months ago, by DPH Code Enforcement Investigator Ivy Phan on August 12, 2025, when she unconditionally

transmitted partially redacted *SFPD Incident Report No. 250337568* with the name of the decoy **not** redacted, to me with a cc: to her work colleagues, Ivy Phan, and Danny Lee, as well as to and their boss, Jennifer Callewaert. The same incident report and emails with the named undercover agent were released to me and the public pursuant to a *Public Records Act* request on October 28, 2025 (DPH file name: "REDACTED RR #25-7799-3446 Balboa Street - Richmond Serenity Spa").

Stating that the identity of the undercover agent has been confidential **at all times** appears to be untrue.

"3. *The undercover agent whose identity is at issue is the sole operative assigned to conduct covert investigations into illicit activity at massage establishments within the City and County of San Francisco pursuant to San Francisco Health Code Article 29. Disclosure of the agent's physical appearance would render him recognizable to the regulated community, thereby compromising the integrity of ongoing and future investigations.*

The declarant, Ms. Vega, and her crew have been inspecting massage establishments for years. Most, if not all, of the establishments have video equipment in their plain view as inspectors. This equipment records all who enter. The agent's physical appearance has no doubt been recorded many times; it is logical to assume that he is totally recognizable to the "regulated community." It is highly disingenuous to represent under oath that his likeness has not been compromised.

"4. *Even if disclosure were subject to a carefully crafted protective order, the risk of harm remains substantial. Once the agent's physical appearance is disclosed, it cannot be undone. Protective orders cannot fully eliminate the risk of inadvertent disclosure or misuse, nor can they restore the agent's anonymity once compromised. **Because the same legal counsel has historically represented other massage establishments that have been under investigation, there is a significant risk that the agent's identity could be shared with those clients, intentionally or not, undermining the City's broader enforcement strategy.***" (emphasis added)

A declaration must contain only facts personally known to be true to the declarant, not speculation. If this statement is directed towards me, I find it highly defamatory and untrue. And, once again, the identity of the decoy has already been released and compromised by DPH multiple times. There is no longer any expectation of confidentiality.

What is the purpose of DPH's privilege assertion based on erroneous declaration? It appears solely to prevent face-to-face (cross-) examination of the undercover agent. DPH may be worried that an effective cross-examination and impeachment of the agent would reveal, *inter alia*, his reported 4-day suspension ordered by the Police Chief for an unlawful search, his reported apparent dereliction of duty in allowing a kidnapping suspect to bring a loaded weapon into the jail, and the fact that his SFPD overtime pay exceeds his highly compensated regular pay. The undercover agent's true motivation seems to have everything to do with generating overtime money and little to do with public health or safety. It is also apparent that if his description of the events at *Richmond Serenity Spa* is true, he behaved highly improperly. Furthermore, 4 years ago, when DPH attempted to revoke the permit of *Richmond Serenity Spa* and they had no reluctance then to personally produce their undercover agent. The records released on Oct. 29, 2025, also reveal DPH's initial intent to have the undercover agent personally testify.

The DPH Massage Program crew are likable employees, and it is hard to believe that Ms. Vega, with impressive *REHS* credentials, would knowingly and willingly make such a declaration unless she was distracted and/or under extreme pressure to do. Two paragraph "2"s in her Declaration leads one to believe that it was a just a rough draft and was not read or proofread before signing. Before matters further escalate, my clients have authorized me to request that you take the opportunity now to rescind the untimely and inapposite privilege assertion based on an incorrect and flawed declaration.

Thank you for your courtesy and cooperation,



Paul V. Horcher, Attorney for Jing Huang and Liyan Wang
Owners of Richmond Serenity Spa, 3446 Balboa St.

cc: Clients, interested parties

Paul V. Horcher, Esq. SBN 084882
601 Van Ness Ave., #928
San Francisco CA 94102-3257
T: (909) 861-5555 F: (415) 301-4262 E: pvh831@gmail.com

Attorney for Jing Huang & Liyan Wang dba Richmond Serenity Spa

CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH, ENV. HEALTH SECTION
49 South Van Ness Ave., Suite 600, San Francisco CA 94103

SAN FRANCISCO DEPT. OF PUBLIC HEALTH ("DPH")) DECLARATION OF JING HUANG
vs. JING HUANG and LIYAN WANG dba) Hearing Date/Time: 11-20-25 at 9:00 p.m.
RICHMOND SERENITY SPA ("the Spa"), 3446 BALBOA ST.) Hearing Place: 49 S Van Ness Ave SF

I, JING HUANG, declare as follows:

1. I immigrated to San Francisco from China and became a USA citizen. Since 2015, I have co-owned the Spa. It was located first at 3443 Balboa St., San Francisco CA then relocated across the street to 3446 Balboa St. My equal business partner is Liyan Wang ("Ms. Wang"). We are both in good standing as *California Massage Therapy Council* ("CAMTC") Certified Massage Therapists and *California Board of Barbering & Cosmetology* estheticians.¹

2. Ms. Wang and I ("We") are not kids; I am 61 and Ms. Wang is 49.

3. We fully complied with DPH's COVID-19 orders that stopped our only income source by closing the Spa for 8 long months from 03-16-20 to 09-14-20 and from 12-04-20 to 01-28-21 that put us on the brink of insolvency.

4. We have always wanted good relations with our permitting agency, DPH, but 4 years ago in 2021, with the help of a "cash raid" of some overtime hungry officers led by SFPD Inspector Antonio Flores,² DPH attempted to revoke the Spa's permit when it was located across the street. at 3443 Balboa St. with similar highly questionable allegations. We appealed DPH's unjust *Notice of Determination* ("NOD") authored by DPH's Jennifer Callewaert.

After a Hearing, the Independent Hearing Officer, Tinetta R. Thompson, saw through DPH's unfounded and

¹ Exhibit C.

² In 2023 Inspector 3 Antonio Flores, was paid total benefits of \$454,505.36 of which \$196,139.73 was regular pay and \$139,975.53 in overtime. (Source: www.transparentcalifornia.com). Flores' overtime pay has more than doubled over the past decade, peaking at more than \$160,000 in the last fiscal year (Source: https://sfstandard.com/2025/09/30/sfpd-svu-historic-staffing-lows-longest-detective/?utm_campaign=daily&utm_medium=email&utm_source=sfs_newsletter&utm_term=09_30_25. San Francisco Standard (09-30-25).

1 unproven case and ruled for us and against DPH. She stated: "*I cannot support a determination of liability for the co-*
2 *owners of Richmond Serenity Spa*" and "*By a preponderance of the evidence, Jing Huang and Liyan Wang, co-*
3 *owners of Richmond Serenity Spa (Permit #M-87025), are not liable for violations of SFHC §§29.17(b) and 29.31(f).*"

4 5. DPH prematurely noticed our landlord about their 2021 NOD while the matter was still pending³
5 apparently to get him to evict us. This officious and malicious action collaterally soured our relationship with the
6 landlord, so we sought a new location thereafter.

7 6. Using my life savings as a down payment, I paid \$575,000.00 for the ground floor of the real property
8 directly across the street from 3443 Balboa St. commonly known as 3446 Balboa St., Unit #1, San Francisco CA
9 94121 ("the premises") where *G & J Beauty Salon* and *Yindeli Shiatsu* operated before. My monthly mortgage
10 payment is \$3,000.00. The annual property taxes are ~\$7,300.00 (an average of ~\$600.00/month. I leased the
11 premises for 5 years to my partnership with Ms. Wang.

12 7. Contrary to the undercover officer's ("decoy") erroneous *SFPD Incident Report 250337568*, the Spa's
13 premises have never been at 3448 Balboa St. 3448 Balboa St. is the postal address for the four-unit building, and is
14 used for upstairs residential units 2, 3, and 4. 3446 Balboa St. is the postal address for unit #1, which is a ground
15 floor commercial unit. This error makes me wonder if the decoy has confused our place with another visit he made.

16 8. The Spa is small, just 1,075 square feet, all at ground level, and is our sole means of support.

17 9. The Spa offers massages, facials, and waxing; massage is roughly 85% of our business. 50% of our
18 patrons are men, 30% are women, and 20% are couples. There are 3 therapy rooms; 2 are dedicated to massage
19 exclusively and 1 room is used for couples' massage and esthetician services. Though it is hard to please everyone,
20 the Spa has solid 3.5 Yahoo, 3.7 Yelp, and 4/5 Google ratings (19 5/5 Google ratings since our new advertising
21 campaign began in May 2025). We advertise only through our tasteful website (<https://richmondserenityspa.com/>)⁴
22 and through Google.com. Our Google.com advertising targets women and couples as patrons. 90%+ of the Google
23 generated reservations are for women and couples. We don't want the kind of customers that sexy ads bring.
24
25
26

27 ³ Exhibit D.

28 ⁴ Exhibit E

1 10. Initially, Ms. Wang and I both worked at the Spa every day where we jointly made management
2 decisions. We have since hired 3 middle aged experienced and credentialed part-time masseuses with clean records
3 to allow us to have a little personal time off. To reduce turnover and to help keep the staff on the straight and narrow,
4 we pay above market rates to our staff compared to our competitors. At least one of us tries to be at the Spa each
5 day it is open. Though I have experienced serious health issues lately, I try to work full-time. Ms. Wang currently
6 works three days per week, and the three other masseuses work part-time. Our ages ranged from 49 to 65 this year.
7 I know what prostitution is. I take my responsibilities as an owner seriously and know that it is my job to do everything
8 I can to prevent prostitution at the Spa. Ms. Wang and I both recently completed a prostitution prevention class to
9 further enhance our understanding;⁵ we intend to make this useful court approved class a condition of employment.
10

11 11. The Spa's hygiene was last inspected by DPH on July 16, 2025. Only a minor issue with the refrigerator
12 was noted; they returned later to re-inspect and found all in order. The Spa is not a threat to public health or safety;
13 it is the epitome of good hygiene, professionalism, and compliance.

14 12. The Spa is a business that sees hundreds of clients each month and we are at a disadvantage when it
15 comes to recalling details of a specific occasion. The SFPD decoy officer said he arrived at our establishment a full
16 month before DPH notified us. I am nonetheless confident in my denial of the allegations because an incident of
17 solicitation or lewd conduct on the premises would be so out of the ordinary that it would necessarily be memorable.
18

19 13. We do not employ any masseuses with criminal records for prostitution. The masseuses present at the
20 Spa at the time of the decoy operation were heretofore employed at the Spa without a complaint or a citation to us.

21 14. The oversized towels to cover the patrons are made available in each room. We don't offer the option to
22 be nude, and we do not specifically instruct our customers to undress completely.

23 15. All staff and customers are appropriately attired. Permits are on display and Licenses are on file.

24 16. I take my responsibility to the public seriously. The Police and DPH worry about rogue cops and rouge
25 inspectors. We worry about rogue masseuses endangering our livelihoods, so we minimize that chance by paying
26

27 _____
28 ⁵ Exhibit F.

1 our staff well, do not engage in sexy advertising that attracts undesirable patrons, enforce modest clothing apparel
2 requirements, and allow only DPH permitted masseuses who have been FBI/DOJ level screened by SFPD and
3 CAMTC to work at the Spa. We have never hired a masseuse without CAMTC or San Francisco credentials. If we
4 have doubts about the ethical fitness of an applicant for a massage position, we simply don't hire them and we have
5 any doubts about staff members we fire them. We absolutely prohibit the soliciting of money for sex on the premises.
6 We hold weekly meetings with our masseuses reinforcing our strict policies about illegal activity and keeping the
7 massage doors unlocked. Our policy towards patrons who ask for sexual favors for money is to directly inform "*You*
8 *have come to the wrong place; we don't do that!*" We then refund their money and show them the exit door. I have
9 invested too much to allow the Spa to be closed for illegal behavior.

10
11 17. We were shocked to receive the initial July 16, 2025, DPH Notice of Violation (NOV) regarding the
12 alleged incident between an undercover officer ("decoy") and a masseuse at the Spa. I thought it odd that the decoy,
13 a sworn officer, was so careless and negligent that he failed to question, identify, and detain the alleged rogue
14 masseuse. I now know that he has been careless before and was suspended for 4 days by the SFPD Chief.⁶ I also
15 wondered if something really happened why neither SFPD nor DPH alerted us to so we could have taken appropriate
16 action. I believe that public health and public safety took a back seat to DPH's vengeful vendetta to maliciously ruin
17 us and to SFPD's greedy officers out to make more easy money off the taxpayers through overtime abuse again.

18
19 18. After receiving this incomplete accusation, I tried to determine if something really happened and identify
20 the culprit. At the time the SFPD decoy said he entered the premises there were two part-time masseuses present at
21 the Spa on June 17, 2025 pending my arrival later that afternoon. One was 65 years old and the other about 60,
22 much older than the 50-year old the decoy he said he encountered. Before the unbelievable news of the alleged
23 June 17, 2025, incident, I had no reason to suspect any of the masseuses of misconduct. They were both CAMTC
24 Certified Massage Therapists passing FBI/DOJ level background checks. Although handicapped by the decoy's
25

26 ⁶ The decoy and three other SFPD officers failed to find a loaded gun that allowed a kidnapping suspect to bring it into the jail
27 (Source: <https://sfstandard.com/2022/08/02/a-kidnapping-suspect-brought-a-loaded-gun-to-jail-officials-blame-sf-police-for-failing-to-find-it/>) and the SFPD Chief suspended the decoy for 4 days for an unlawful search (Source: [https://sb1421publicarchive-sanfranciscopd.govqa.us/WEBAPP/rs/\(S\(kpivk1bq4voedf2r5usl0rvn\)\)/RequestArchiveDetails.aspx?rid=176231&view=45](https://sb1421publicarchive-sanfranciscopd.govqa.us/WEBAPP/rs/(S(kpivk1bq4voedf2r5usl0rvn))/RequestArchiveDetails.aspx?rid=176231&view=45))
28

1 dubious decision not to detain, question, and identify the alleged rogue masseuse, I, unlike the decoy, sharply
2 questioned the 2 masseuses who were at the Spa on June 17, 2025. They both adamantly denied any involvement
3 with him.

4 19. It is very unfair and unjust to revoke our establishment permit and fine us; if we lose our permit, we will
5 consequently lose our CAMTC massage certifications too and will be unable to make a living. We are innocent and
6 don't deserve this draconian and unreasonable punishment.

7 20. I have read and signed a rough Google® translation of this document into simplified Chinese.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
9 correct, and that this declaration was executed on November 11, 2025, at San Francisco CA.

10
11 
12 JING HUANG

**San Francisco Police Department
INCIDENT REPORT**

Report Type: **Initial**

250337568

INCIDENT	Incident Number 250-337-568	Occurrence From Date / Time 06/17/2025 16:00	Occurrence To Date / Time 06/17/2025 16:30	Reported Date / Time 06/17/2025 16:30	CAD Number 251682621				
	Type of Incident HOUSE OF PROSTITUTION, KEEPING OR RESIDING IN 13010 SOLICITS FOR ACT OF PROSTITUTION 13060							Retail Theft? <input type="checkbox"/>	
	Location of Occurrence: 3448 BALBOA ST			At Intersection with/Premise Type MISC. BUILDING OR STORE			District RICHMOND		
	Confidential Report? <input checked="" type="checkbox"/>	Arrest Made? <input type="checkbox"/>	Suspect Known? <input type="checkbox"/>	Suspect Unknown? <input checked="" type="checkbox"/>	Non-Suspect Incident? <input type="checkbox"/>	Domestic Violence? <input type="checkbox"/>	(Type of Weapon Used)	Use of Force? <input type="checkbox"/>	Reporting Unit 5W135
	Location Sent / On View: 3448 BALBOA ST			At Intersection with				Reporting District RICHMOND	
	Crime and Clearance Status 0	Reported to Bureau SVUHT	Name Glenn, Robert M	Star 2283	Date/ Time 06/17/2025 16:30	Elder Victim? <input type="checkbox"/>	Gang Related? <input type="checkbox"/>	Juvenile Subject? <input type="checkbox"/>	Prejudice Based? <input type="checkbox"/>

Have you reviewed the attached list of procedures required by Department General Order (DGO) 7.04?

250337568

OFFICIAL CERTIFICATION	I declare under penalty of perjury, this report of <u>4</u> pages is true and correct, based on my personal knowledge, or is based on information and belief following an investigation of the events and parties involved. PROP 115 CERTIFIED 5 Year/Post							
	Reporting Officer GLENN, ROBERT M	Star 2283	Station SVU - Human Trafficking	Watch 1	Date 06/17/25 18:57			
	Reviewing Officer FLORES, ANTONIO L	Star 683	Station SVU - Human Trafficking	Watch 1	Date 06/17/25 19:30			
	OIC FLORES, ANTONIO L	Star 683	Station SVU - Human Trafficking	Watch 1	Date 06/17/25 19:30			
	Related Case --	Related Case --	Re-assigned to Copies to 5T300B	Assigned to 5T300B	Add'l Copies	Assigned by RG 2283		

REPORTER	Code R 1	Name (Last, First Middle) SFPD , #2283			Alias			Email			
	Day Phone (415) 553-1735	Type Work	Home Address			City		State	Zip Code		
	Night Phone (415) 930-1720	Type Cell	Work Address 850 BRYANT STREET			City SAN FRANCISCO		State CA	Zip Code 94103-		
	DOB / Age	DOB Unk. <input type="checkbox"/>	or age between and	Race	Sex	Height	Weight	Hair Color	Eye Color	ID Type Jurisd. ID No.	
	Confidential Person <input type="checkbox"/>	Violent Crime Notification <input type="checkbox"/>	293 PC Notification <input type="checkbox"/>	Star	Follow-up Form YES <input type="checkbox"/>		Statement YES <input type="checkbox"/>	Relationship to Subject			
	School (if Juvenile)		Injury/Treatment			Other Information/If Interpreter Needed Specify Language					
	Interpreter Needed <input type="checkbox"/>	Language	Language Description(if Other)		Language Line Service/Interpreter ID#		Bilingual Ofc Star#				

**San Francisco Police Department
INCIDENT REPORT**

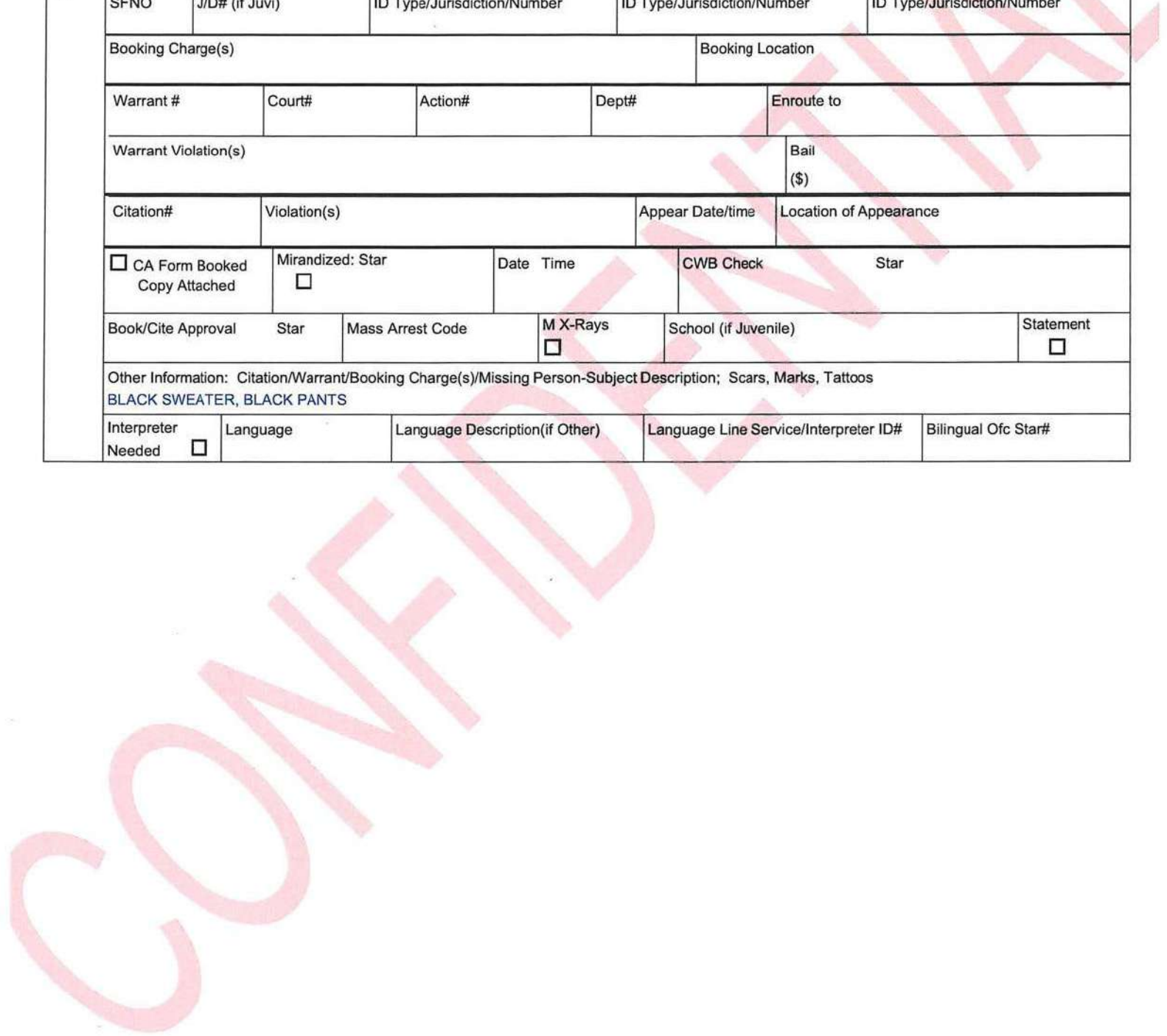
Report Type: **Initial**

250337568

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1

Code S 1	Name (Last, First Middle) UNKNOWN, UNKNOWN		Alias			Email			
Day Phone	Type	Home Address		City		State	Zip Code		
Night Phone	Type	Work Address 3448 BALBOA ST		City SAN FRANCISCO		State CA	Zip Code 94121-		
DOB Unknown <input checked="" type="checkbox"/>	Date of Birth	Age	or age between 45 and 55	Race A	Sex F	Height 5'2	Weight 130	Hair Color BLK	Eye Color BRO
SFNO	J/D# (if Juvi)	ID Type/Jurisdiction/Number		ID Type/Jurisdiction/Number		ID Type/Jurisdiction/Number			
Booking Charge(s)					Booking Location				
Warrant #	Court#	Action#	Dept#		Enroute to				
Warrant Violation(s)						Bail (\$)			
Citation#	Violation(s)			Appear Date/time	Location of Appearance				
<input type="checkbox"/> CA Form Booked Copy Attached	Mirandized: Star <input type="checkbox"/>		Date Time	CWB Check		Star			
Book/Cite Approval	Star	Mass Arrest Code	M X-Rays <input type="checkbox"/>	School (if Juvenile)			Statement <input type="checkbox"/>		
Other Information: Citation/Warrant/Booking Charge(s)/Missing Person-Subject Description; Scars, Marks, Tattoos BLACK SWEATER, BLACK PANTS									
Interpreter Needed <input type="checkbox"/>	Language	Language Description(if Other)		Language Line Service/Interpreter ID#		Bilingual Ofc Star#			



NARRATIVE

On the above date and time, I was tasked to conduct undercover operations at 3448 Balboa Street, Richmond Serenity Spa, the goal of this operation was to see if there was illegal prostitution taking place.

A/LT. Flores held a briefing at SVU. Officer Stucki #2471 and Sgt. Lyons #2438 also attended the briefing. The phrase "This is exciting." Was the sign to the units that the there had been an act of prostitution had been solicited. A/Lt Flores provided me with \$200 ((2) hundred dollar bills in Marked City Funds. I photographed the money before the operation.

I was dropped off by Officer Stucki in the area of 3448 Balboa Street. I utilized [REDACTED]. I was wearing a Tan sweatshirt, black T-shirt, grey pants, and black and white shoes.

I went to the door and it was unlocked. I walked inside and was met by (S1) Asian Female who directed me to follow her to a room. I saw that there was a room marked #6 on the left hand side, a laundry room and then the room that I was directed to. (S1) asked How long? I said half hour and she told me that it would cost \$50. I paid with (1) hundred dollar bill and was told that they would bring me my change.

I did not see any other people in the building as I walked back. I could hear voices coming from the other rooms both male and female.

(S1) is describes as an Asian Female, approximately 50 years old, black sweater, black pants. (S1) was approximately 5'2" tall and slender build.

(S1) pointed to the table. I asked (S1) if I was supposed to get naked. (S1) stated to take off and pointed to the nearby chair. I took this to mean that I was to undress and place my clothing on the chair.

The room is described as an inward opening door. There was a massage table in the center of the room. The lights were dim. There was a chair in the left corner opposite the door. A small side table between the chair and the door. In the far right corner was a taller table with lotions and a roll of toilet paper.

I undressed and got under the blanket. (S1) returned and placed (2) Twenty dollar bills and one ten dollar bill on the table. (S1) removed the blanket and I was now laying on the massage table face down, nude.

(S1) rubbed my shoulders, legs, and buttocks. (S1) tried to rub my perineum area. I tried to prevent that butt clinching my buttocks cheeks.

(S1) asked if I wanted to turn over. (S1) toweled me off with a warm towel. (S1) grabbed blanket that was near my feet and moved it off of the bed. (S1) massaged my chest and stomach. (S1) grabbed my penis with her left hand. (S1) asked "you want?" (S1) made an up and down motion with her hand in the air while making a hollow fist. (Fingers open making a circle) I know based on my training and experience that (S1) was asking if I wanted to her to manually stimulate me (Hand Job).

I asked (S1) how much and she stated "you tell me." I offered 60 dollars and she stated yes. (S1) went over to the corner shelf area and got oil. (S1) grabbed my penis now with both hands. I gave the predesignated signal twice. Sgt. Lyons called.

I told (S1) that it was my wife. (S1) stated that she wanted me to lay back down and go "real quick". (S1) offered several times for me to "finish." I told her that I would still give her the money but I had to leave. (S1) handed me a towel to clean my genitals with.

I gave (S1) the \$50 remaining dollars and exited the building.

San Francisco Police Department
INCIDENT REPORT

Report Type: **Initial**

250337568

I ended the recordings, I uploaded the photographs to this report as well as the [REDACTED]

I additionally placed the photos and recordings on a Scan disk.

CONFIDENTIAL



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

July 23, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 ("Establishment"), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report ("Incident Report") and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

1. **Section 29.17(b) Lewd Conduct and Prostitution Prohibited.** Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.
2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.

2. That you shall pay the administrative penalties of **\$7,500** for the occurrence of the violation as follows:
SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.

(A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee

(12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises.

(A) Administrative fine: **\$2,500** to be paid by Massage Business permittee, and

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has the right to request a hearing by submitting the attached Director's Hearing Request Form within 15 days from the date this Notice was received. If no request for a hearing is filed with the Director within the appropriate period, the right to request a hearing shall be deemed waived, and the Director's determination shall become final and effective on the 15th day from the date this Notice was received.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this Article 29, any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,

Jennifer Callewaert

Jennifer Callewaert, MS, REHS
Acting Director of Environmental Health

Attachment:
Director's Hearing Request Form
Director's Hearing Guidelines

Cc:
Property Owners of 3446 Balboa Street: Jing Huang



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

August 25, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Amended Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 (“Establishment”), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report (“Incident Report”) and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

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2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

On July 23, 2025 a Notice of Determination and a Director’s Hearing Request Form were issued to the business owner. The notice provided details of the violations of the SFHC, Article 29 with corresponding enforcement action.

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That you shall pay the administrative penalty of **\$7,500** and permit penalty of 60 days for the occurrence of the violation as follows:
SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.
 - (3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.
 - (A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee; and
 - (B) Permit Penalty: Mandatory **60-120 days suspension** of Massage Establishment permit.
 - (12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises.
 - (A) Administrative fine: \$2,500 to be paid by Massage Business permittee

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has exercised the right to request a hearing and submitted a Director's Hearing Request Form, received on August 6, 2025. On August 20 2025, case #MSG-25-03 was generated and a Notice of Hearing was issued in response to the request.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this [Article 29](#), any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,



Jennifer Callewaert, MS, REHS
Acting Director of Environmental Health

Cc:
Property Owners of 3446 Balboa Street: Jing Huang



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

August 27, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Amended Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 (“Establishment”), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report (“Incident Report”) and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

1. **Section 29.17(b) Lewd Conduct and Prostitution Prohibited.** Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.
2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

On July 23, 2025 a Notice of Determination and a Director’s Hearing Request Form were issued to the business owner. The notice provided details of the violations of the SFHC, Article 29 with corresponding enforcement action.

On August 25, 2025 an amended NOD were issued to the business owner and counsel. The notice included a permit penalty pursuant to sec 29.45 (3)(b).

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That your Massage Establishment Health Permit #ME-120465 shall be revoked.
3. That business owners, Liyan Wang and Jing Huang, shall be ineligible for a Massage Business Permit for a period of five years from the date of permit revocation.
4. That you shall pay the administrative penalty of **\$7,500** for the occurrence of the violation as follows:
SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.

(A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee

(4) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises

(A) Administrative fine: **\$2,500** to be paid by Massage Business permittee, and

(B) Permit penalty: Revocation of Massage Practitioner permit and **revocation of Massage Business permit**

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has exercised the right to request a hearing and submitted a Director's Hearing Request Form, received on August 6, 2025. On August 20 2025, case #MSG-25-03 was generated and a Notice of Hearing was issued in response to the request.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this [Article 29](#), any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,



Jennifer Callewaert, MS, REHS
Acting Director of Environmental Health

Cc:

Property Owners of 3446 Balboa Street: Jing Huang

Incident Report Request

Reference No: T017067-072525

Contact E-Mail: pvh831@gmail.com

The San Francisco Police Department has received your request for Incident Report Number 250337568. If an incident report of 9-digit case number was not provided, there will be a delay in processing, as your request will need to be researched by CISU staff.

Your request was received on 7/25/2025 and given the reference number T017067-072525 for tracking purposes. Your request will be processed in the order it was received. If applicable, your request will be expedited pursuant to the statutory guidelines.

Under CA Family Code § 6228, incident reports requested by a victim or his or her representative for the alleged crimes of domestic violence, sexual assault, stalking, human trafficking, and abuse of an elder or dependent adult are entitled to receive copies within five (5) working days of the request, unless good cause for delay exists. If good cause exists, reports shall be released no later than ten (10) working days after the request is made.

Your report is available for processing upon ID verification. Please send us a copy of your Valid Identification (any current ID, including a valid driver's license, SF City ID card, a State-Issued ID card or a Passport (originating country Ok). Your request will be processed upon receipt.

If you prefer to pick up your report in person, please come to Police Headquarters, 1245 3rd St., during business hours, Monday – Friday, except Holidays, 8:00AM - 5:00 PM. You can contact our office for an appointment, but it is not necessary.

To monitor the progress or updated status of this request please log into the SFPD Public Records Center.

Thank you,

San Francisco Police Department
Crime Information Services Unit
1245 3rd Street, First Floor
San Francisco, CA 94158
415-575-7232

Counter Operating Hours:
Monday – Friday 8:00 am to 5:00 pm, except Holidays
Closed weekends and evenings



Request Visibility: Published

Request 25-5567 Open





Dates

Received


July 27, 2025 via web


Requester

 Paul Horcher

 pvh831@gmail.com

 601 Van Ness Ave, #928, San Francisco , CA, 94102

 909-861-5555

 Law Offices of Paul V. Horcher

Request

All files from **January 1, 2023** to the present, associated with **3446 Balboa St.** (aka 3448-1 Balboa Street), San Francisco CA 94121, APN Sequence 1, Lot 041 Block 1578 (**known as Richmond Serenity Spa owned by Jing Huang**) - including, but not limited to, all documents, massage establishment applications, massage inspection reports, SFPD Incident Reports, stipulations, hearing notices, intra-agency communications, inter-agency communications such as with Planning (PDSF) and Building Inspection (SFDBI), all BPA's, etc., photos, emails, text messages, videos, data, other records, and all audio and/or video recordings, BWC recordings, CD's and/or DVD's, MP4's etc.

[Show less](#)

Staff assigned

Departments

Public Health: Massage

Point of contact

Bernard Chan

Timeline

Documents

 **Department assignment** Anyone with access to this request

Public Health: Massage

July 27, 2025, 3:27pm by the requester

 **Request opened** Anyone with access to this request

Request received via web

July 27, 2025, 3:27pm by the requester

Skip to main content

City and County of San Francisco

NextRequest

Request Visibility: Published

Request 25-7799 Open




1 of 1 with filters active


Dates


Received


October 07, 2025 via web


Requester

 Paul Horcher

 pvh831@gmail.com

 601 Van Ness Ave, #928, San Francisco, CA, 94102

 909-861-5555

 Law Offices of Paul V. Horcher

Request

All files from **August 4, 2025** to the present, associated with **3446 Balboa St.** (aka 3448-1 Balboa Street), San Francisco CA 94121, APN Sequence 1, Lot 041 Block 1578 (**known as Richmond Serenity Spa owned by Jing Huang**) - including, but not limited to, all documents, massage establishment applications, massage inspection reports, SFPD Incident Reports, stipulations, hearing notices, intra-agency communications, inter-agency communications such as with Planning (PDSF), Building Inspection (SFDBI), San Francisco Police Dept. (SFPD), California Massage Therapy Council (CAMTC), all BPA's, etc., photos, emails, text messages, videos, data, other records, and all audio and/or video recordings, BWC recordings, CD's and/or DVD's, MP4's etc.

Show less

Staff assigned

Departments

Public Health: Massage

Point of contact

Bernard Chan

Timeline

Documents

 **Department assignment** Anyone with access to this request

Public Health: Massage

October 7, 2025, 4:31pm by the requester

 **Request opened** Anyone with access to this request

Request received via web

October 7, 2025, 4:31pm by the requester

FAQS
Help
Privacy

 CIVICPLUS
NextRequest

EXHIBIT 9

<https://drive.google.com/file/d/1CYAS98Ifn2FBD4ZPB2KS9iEE-8O8Y1re/view?usp=sharing>

1 Paul V. Horcher, Esq. SBN 084882
2 601 Van Ness Ave., #928, San Francisco CA 94102-3257
3 Tel. (909) 861-5555 Fax. (415) 301-4262 E-Mail: "pvh831@gmail.com"
4 Attorney for Jing Huang & Liyan Wang dba Richmond Serenity Spa ("the owners")

5 CITY AND COUNTY OF SAN FRANCISCO
6 DEPARTMENT OF PUBLIC HEALTH, ENVIRONMENTAL HEALTH SECTION
7 49 South Van Ness Ave., Suite 600, San Francisco CA 94103

8 SAN FRANCISCO DEPT. OF PUBLIC HEALTH ("SFDPH")) Location ID #120465
9 vs.)
10 JING HUANG and LIYAN WANG) DECLARATION OF SFPD LIEUTENANT (RET.)
11 dba RICHMOND SERENITY SPA) RAYMOND D. KILROY
12 (3446 BALBOA ST)) Hearing Date and Time: 10-22-25 at 9:00 a.m.
13) Hearing Place: 101 Grove St., Rm 300, S.F. 94103

14 I, RAYMOND D. KILROY, declare as follows:

15 1. My name is RAYMOND D. KILROY.

16 2. I retired in 2001 as a Lieutenant with the San Francisco Police Department ("SFPD") after 31 years of
17 honorable service as a sworn officer there. During my career, I worked patrol, Internal Affairs, and retired as the
18 Officer in charge of the *Vice Crimes Unit*. Throughout my career, I also made hundreds of felony arrests and over
19 1,500 arrests for prostitution/solicitation (647(b) PC). These arrests were for street solicitations as well over 30
20 arrests which occurred within unlicensed so-called "massage parlors."

21 3. I have carefully reviewed *SFPD Incident Report 250337568* ("the report") and I have serious concerns
22 regarding the questionable procedures used in the highly suspect undercover operation conducted on June 17, 2025
23 at 4:00 p.m. of *Richmond Serenity Spa* at 3446 Balboa, San Francisco CA 94121.

24 4. There is no indication in the report that there were any complaints of lewd conduct or illegal prostitution
25 taking place at *Richmond Serenity Spa*. The report does state that the decoy operation began at 4:00 p.m. which is
26 usually the time an SFPD officer begins to collect overtime. For this reason, these operations targeting massage
27 establishments at 4:00 p.m. are often called "cash raids" or "money raids."

28 5. The report incorrectly states that the undercover operation took place at 3448 Balboa Street which is the
address for the upstairs residential apartment units. *Richmond Serenity Spa* is located at 3446 Balboa Street, a
commercial address. Even the minute facts in the report should be true and correct for it to be credible.

6. The report does not state the quality and quantity of training, if any, that the undercover officer received.

7. In my experience, it is abnormal for an undercover officer to strip naked and allow oil to be placed on his
genitalia. I never once had a masseuse touch my genitals. I would never have allowed that to be an act of
furtherance for myself or any of the officers under my command, to establish a solicitation case or to close a

DECLARATION OF SFPD LIEUTENANT (RET.) RAYMOND D. KILROY

1 message business. Once you have the appearance of a solicitation, why go further? I cannot imagine a sworn officer
2 allowing a masseuse to touch his genitals and not arrest or cite her immediately if what was stated had happened.

3 8. The report stated that there were a recording and photos of the incident; if so, why weren't they given?

4 9. The report states that there was a bust signal – then why wasn't anyone arrested? Normally the arrest
5 team would then enter and cite the masseuse for a violation of 647(b) PC. In reviewing the statement of the
6 undercover officer regarding his visit on June 17, 2025, I cannot understand why he did not affect an arrest for 647(b)
7 PC if things had happened the way he stated.

8 10. The report does not explain why the non-arrested suspect was not identified either.

9 11. The report states that the undercover overheard voices of a male and female from the other rooms; why
10 were these people not identified and interviewed?

11 12. The report does not state if there have been other undercover investigations at this spa.

12 13. If there was no justification for a 647(b) PC citation, there appears to be no justification for the intended
13 DPH revocation of the massage establishment permit. Logically and fairly, because DPH has not charged the
14 masseuse, it should also have withdrawn its allegations of employer liability against the owners too. Unfortunately,
15 owners of these establishments often are unable to monitor what occurs during a massage. In my experience, rogue
16 masseuses and patrons often talk in a very low voice and use hand signals to prevent the owners from hearing their
17 conversations.

18 14. I believe it is also noteworthy that this was the only case presented to revoke the permit of the premises
19 at this location. There was an attempt to revoke the permit of *Richmond Serenity Spa* in 2021-2022 when it was
20 located across the street at 3443 Balboa Street with similar allegations but at the Appeal Hearing the Hearing Officer
21 wisely saw through DPH's unjustified and unproven case and ruled in favor of the owners of *Richmond Serenity Spa*
22 and against DPH. In my past experiences, we were required to obtain several cases to show a pattern of an owner
23 knowingly allowing prostitution to bring charges against the proprietor. In my experience, we were only successful in
24 closing three massage establishments for repeated violations in San Francisco.

25 15. Under the circumstances, it is highly questionable that neither the SFPD nor DPH promptly notified the
26 owners of the alleged violation. I would like to believe that protection of public safety and health would be paramount
27 to DPH but DPH bizarrely waited a month before telling the owners! It is quite understandable that the San Francisco
28 District Attorney has declined to charge anyone with any violation of any law. The owners are clearly innocent once
again.

16. There was no logical justification for a 647(b) PC allegation because the District Attorney has thus far
refused to allege charges, probably for the same reasons cited above. DPH should also have withdrawn its
allegations of employer liability against the owner too.

DECLARATION OF SFPD LIEUTENANT (RET.) RAYMOND D. KILROY

1 I declare under penalty of perjury that the foregoing is true and correct and that this declaration was
2 executed on October 09, 2025, at Burlingame, CA.

3 
4 RAYMOND D. KILROY

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DECLARATION OF SFPD LIEUTENANT (RET.) RAYMOND D. KILROY

From: [Lawrence, Traci \(DPW\)](#)
To: [Santiago, Eurich \(DPH\)](#); [Obana, Douglas \(DPH\)](#)
Subject: Re: SFDPH November 20th Director's Hearing - case files and agenda
Date: Monday, December 15, 2025 11:17:52 AM
Attachments: [Outlook-for EMAIL](#)

Thank you, Eurich. I hope you had a good weekend.



Traci Lawrence
Program Manager
Office of Policy & Communications
2323 Cesar Chavez Street | San Francisco, CA 94102 | (415) 641-2664 | sfpublicworks.org ·
twitter.com/sfpublicworks

From: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>
Sent: Monday, December 15, 2025 8:32 AM
To: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>; Obana, Douglas (DPH) <douglas.obana@sfdph.org>
Subject: RE: SFDPH November 20th Director's Hearing - case files and agenda

The hearing packets have just been resent to you via SF SecureShare. The download code is
428359

Thank you.

Kind regards,

EURICH SANTIAGO, REHS

Senior Environmental Health Inspector
Water Quality Program
City and County of San Francisco
Department of Public Health | Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Phone: 415.252.3995 | **E-mail:** eurich.santiago@sfdph.org | **Web:** www.sf.gov/ehb

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From: Santiago, Eurich (DPH)
Sent: Monday, December 15, 2025 8:28 AM
To: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>; Obana, Douglas (DPH) <Douglas.Obana@sfdph.org>
Subject: RE: SFDPH November 20th Director's Hearing - case files and agenda

I will have to resend everything. I will then again momentarily.

Kind regards,

EURICH SANTIAGO, REHS

Senior Environmental Health Inspector

Water Quality Program

City and County of San Francisco

Department of Public Health | Environmental Health Branch

49 South Van Ness Avenue, Suite 600

San Francisco, CA 94103

Phone: 415.252.3995 | **E-mail:** eurich.santiago@sfdph.org | **Web:** www.sf.gov/ehb

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From: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>
Sent: Friday, December 12, 2025 2:38 PM
To: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>; Obana, Douglas (DPH) <douglas.obana@sfdph.org>
Subject: Fw: SFDPH November 20th Director's Hearing - case files and agenda

Hi, Eurich.

I noticed the link says it expires on 12/13. Will I still have access to it after that date?

Thanks,



Traci Lawrence
Program Manager

Office of Policy & Communications

2323 Cesar Chavez Street | San Francisco, CA 94102 | (415) 641-2664 | sfpublicworks.org ·
twitter.com/sfpublicworks

From: CCSF SFTP NO-Reply <no-reply@sfgov.org>

Sent: Thursday, November 13, 2025 1:34 PM

To: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>

Subject: SFDPH November 20th Director's Hearing - case files and agenda

To: Traci.Lawrence@sfdpw.org

CC: douglas.obana@sfdph.org



This is an official message sent by the City & County of San Francisco Office of Cybersecurity to you.

One or more files have been sent to you :

Please visit the [Workspace](#) to retrieve files.

You may be prompted to register an account if authentication is required.

These links will expire on 12/13/2025 9:29:59 PM

Office of Cybersecurity

City & County of San Francisco

For help or assistance for this service, please contact the City HelpDesk at (628)652-5000 or
dtis.helpdesk@sfgov.org

From: [Lawrence, Traci \(DPW\)](#)
To: [Santiago, Eurich \(DPH\)](#)
Cc: [Obana, Douglas \(DPH\)](#)
Subject: Re: MSG-25-03 DPH Briefings
Date: Thursday, November 13, 2025 3:32:55 PM
Attachments: [Outlook-for EMAIL](#)

Thanks for your help today, Eurich.

I'm off at 3:30, but I will provide an answer tomorrow morning.

Best,



Traci Lawrence
Program Manager
Office of Policy & Communications
2323 Cesar Chavez Street | San Francisco, CA 94102 | (415) 641-2664 | sfpublicworks.org ·
twitter.com/sfpublicworks

From: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>
Sent: Thursday, November 13, 2025 2:26 PM
To: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>
Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>
Subject: RE: MSG-25-03 DPH Briefings

Per the Program manager, no it is not.

Kind regards,

EURICH SANTIAGO, REHS

Senior Environmental Health Inspector
Water Quality Program
City and County of San Francisco
Department of Public Health | Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Phone: 415.252.3995 | **E-mail:** eurich.santiago@sfdph.org | **Web:** www.sf.gov/ehb

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From: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>
Sent: Thursday, November 13, 2025 2:24 PM
To: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>
Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>
Subject: Re: MSG-25-03 DPH Briefings

Thanks, Eurich.

Question for clarity, was the undercover officer in this current case the same officer who investigated Serenity in 2021?



Traci Lawrence
Program Manager
Office of Policy & Communications
2323 Cesar Chavez Street | San Francisco, CA 94102 | (415) 641-2664 | sfpublicworks.org ·
twitter.com/sfpublicworks

From: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>
Sent: Thursday, November 13, 2025 2:11 PM
To: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>
Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>
Subject: FW: MSG-25-03 DPH Briefings

See email and attachment regarding your question.

Also, per the Program manager for the 2025 case, the undercover officer is the same reporting officer on the police report.

Kind regards,

EURICH SANTIAGO, REHS
Senior Environmental Health Inspector
Water Quality Program
City and County of San Francisco
Department of Public Health | Environmental Health Branch

49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103

Phone: 415.252.3995 | E-mail: eurich.santiago@sfdph.org | Web: www.sf.gov/ehb

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From: Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>

Sent: Thursday, November 13, 2025 2:06 PM

To: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>; Phan, Ivy (DPH) <ivy.phan@sfdph.org>

Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>

Subject: Re: MSG-25-03 DPH Briefings

Hi Eurich, please see the attached email. This was also included in our submittals that was sent to you and Mr. Horcher today.

We cannot accurately verify the number of available undercover officers with SFPD in 2021. I can confirm that the decoy operation that occurred at 3443 Balboa St in 2021 included 1 undercover SFPD officer.

Michelle Vega, REHS

Principal Environmental Health Inspector
Retail Tobacco, Massage, and Consumer Protection Program
Environmental Health Branch
Population Health Division
San Francisco Department of Public Health
49 South Van Ness, Suite 600
San Francisco, CA 94103
General: [\(415\)-252-3800](tel:(415)252-3800)
Direct: [\(415\)252-3803](tel:(415)252-3803)

Email: Michelle.delacruz@sfdph.org

From: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>

Sent: Thursday, November 13, 2025 1:05:30 PM

To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>

Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>

Subject: FW: MSG-25-03 DPH Briefings

See below.

Kind regards,

EURICH SANTIAGO, REHS

Senior Environmental Health Inspector

Water Quality Program

City and County of San Francisco

Department of Public Health | Environmental Health Branch

49 South Van Ness Avenue, Suite 600

San Francisco, CA 94103

Phone: 415.252.3995 | E-mail: eurich.santiago@sfdph.org | Web: www.sf.gov/ehb

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From: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>

Sent: Thursday, November 13, 2025 12:06 PM

To: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>

Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>

Subject: Re: MSG-25-03 DPH Briefings

Thank you; however, the document (SFPD Incident report No. 250337568) Attn. Horcher refers to is not attached. Also, I have an additional question. How many undercover officers were on staff at the time DPH attempted to revoke Serenity's permit 4 years ago?



Traci Lawrence

Program Manager

Office of Policy & Communications

2323 Cesar Chavez Street | San Francisco, CA 94102 | (415) 641-2664 | sfpublicworks.org

twitter.com/sfpublicworks

From: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>

Sent: Thursday, November 13, 2025 11:18 AM

To: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>

Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>

Subject: FW: MSG-25-03 DPH Briefings

See email directly below and attachment from Ivy Phan.

Kind regards,

EURICH SANTIAGO, REHS

Senior Environmental Health Inspector

Water Quality Program

City and County of San Francisco

Department of Public Health | Environmental Health Branch

49 South Van Ness Avenue, Suite 600

San Francisco, CA 94103

Phone: 415.252.3995 | **E-mail:** eurich.santiago@sfdph.org | **Web:** www.sf.gov/ehb

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From: Phan, Ivy (DPH) <ivy.phan@sfdph.org>

Sent: Thursday, November 13, 2025 11:13 AM

To: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>

Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>

Subject: Re: MSG-25-03 DPH Briefings

This is the only communication I have with business owner's counsel from 8/12/2025

Regards,

Ivy Phan

Code Enforcement Investigator

San Francisco Department of Public Health

Population Health Division

Environmental Health Branch

49 South Van Ness Avenue, Suite 600

San Francisco, CA 94103

Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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Sent: Thursday, November 13, 2025 10:39 AM
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Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>
Subject: FW: MSG-25-03 DPH Briefings

See email from Hearing Officer Thomson below.

Thank you.

Kind regards,

EURICH SANTIAGO, REHS

Senior Environmental Health Inspector

Water Quality Program

City and County of San Francisco

Department of Public Health | Environmental Health Branch

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Subject: Re: MSG-25-03 DPH Briefings

Hi, Eurich.

May I have a copy of Ivy Phan's email dated August 12, 2025?



Traci Lawrence

Program Manager

Office of Policy & Communications

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twitter.com/sfpublicworks

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Subject: Re: MSG-25-03 DPH Briefings

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Subject: RE: MSG-25-03 DPH Briefings

Thank you for the update.

The Program manager would like to have a decision made as soon as possible, so they can let the police officer know if they need to be at the hearing or not.

Thank you.

Kind regards,

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From: Lawrence, Traci (DPW) <Traci.Lawrence@sfdpw.org>

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Subject: Re: MSG-25-03 DPH Briefings

Hello, Eurich.

This is being sent to confirm receipt. I'll reach out if I have any questions.

Thanks!



Traci Lawrence

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Subject: RE: MSG-25-03 DPH Briefings

Hearing Officer Lawrence:

Attached email and PDF was submitted by the responsible party's counsel regarding Case #MSG-25-03.

The Message program is asking if you can review the email and pdf attachment alongside the brief that was submitted by the Program to prior to making the final determination (if the police officer can provide virtual testimony or not at the 11/20 hearing).

Thank you.

Kind regards,

EURICH SANTIAGO, REHS

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Subject: RE: MSG-25-03 DPH Briefings

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Depending on the type of case, there may be certain portion(s) of the hearings that may or may not be disclosed to the public (Physical identity of undercover police officers involved in the case), if deemed confidential for example.

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Subject: Re: MSG-25-03 DPH Briefings

Hello, Eurich.

Are these cases confidential?



Traci Lawrence

Program Manager

Office of Policy & Communications

From: Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>

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Cc: Obana, Douglas (DPH) <douglas.obana@sfdph.org>

Subject: FW: MSG-25-03 DPH Briefings

Hearing Officer Lawrence:

Please see attached briefings regarding Case #MSG-25-03 for the upcoming SFDPH Director's Hearing on 11/20/25. Additional case documents will be sent to you later today or tomorrow at latest.

Thank you.

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Cc: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>; HANISH, BESS (CAT) <Bess.Hanish@sfcityatty.org>; Phan, Ivy (DPH) <ivy.phan@sfdph.org>

Subject: MSG-25-03 DPH Briefings

Evening Doug and Eurich

Please see attached briefings for MSG-25-03.

Michelle Vega, REHS

Principal Environmental Health Inspector

Retail Tobacco, Massage, and Consumer Protection Program

Environmental Health Branch
Population Health Division
San Francisco Department of Public Health

49 South Van Ness, Suite 600
San Francisco, CA 94103
General: (415)252-3872

Direct: (415)252-3803

Email: Michelle.delacruz@sfdph.org

Web: www.sfdph.org/dph/eh



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Cc: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>; HANISH, BESS (CAT)

<Bess.Hanish@sfcityatt.org>; Phan, Ivy (DPH) <ivy.phan@sfdph.org>

Subject: MSG-25-03 DPH Briefings

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Michelle Vega, REHS

Principal Environmental Health Inspector

Retail Tobacco, Massage, and Consumer Protection Program

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1 Paul V. Horcher, Esq. SBN 084882 ("owners' counsel")
2 601 Van Ness Ave., #928
3 San Francisco CA 94102-3257
4 Tel. (909) 861-5555 Fax. (415) 301-4262
5 E-Mail: "pvh831@gmail.com"

6 Counsel for Attorney for Jing Huang & Liyan Wang dba Richmond Serenity Spa

7 CITY AND COUNTY OF SAN FRANCISCO
8 DEPARTMENT OF PUBLIC HEALTH, ENVIRONMENTAL HEALTH SECTION
9 49 South Van Ness Ave., Suite 600, San Francisco CA 94103

10 SAN FRANCISCO DEPT. OF PUBLIC HEALTH
11 ("DPH")
12 vs.
13 JING HUANG and LIYAN WANG ("Owners")
14 dba RICHMOND SERENITY SPA ("the Spa")
15 (3446 BALBOA ST)

16 **Case No. MSG-25-03**

17 **EVIDENTIARY OBJECTIONS TO DPH**
18 **DIRECTOR'S HEARING CASE CHRONOLOGY**
19 **AND EXHIBITS FILED 11-13-25**

20 Hearing Officer: Traci Lawrence
21 Hearing Date/Time: Nov. 20, 2025 at 1:00 p.m.
22 Hearing Place: 49 S. Van Ness Ave Rms 192-194
23 San Francisco CA 94103

24 **GENERAL OBJECTION TO ENTIRE 11-13-25 UNTIMELY 75-PAGE ENVIRONMENTAL HEALTH BASIS**
25 **FOR PROPOSED ENFORCEMENT ACTION SUMMARY, CHRONOLOGY AND EXHIBITS**

26 On October 22, 2025, DPH employee Douglas Obana, MPH, REHS, Principal Environmental
27 Health Inspector ("Douglas Obana of the DPH Director's Hearing Team") emailed the owners and their
28 counsel, in pertinent part, as follows:

29 *"Hello, This is Douglas Obana with the SFDPH Director's Hearing team. I am reaching out*
30 *regarding the upcoming case number MSG-25-03 for Richmond Serenity Spa located at*
31 *3446 Balboa St....(emphasis added)*

32 On November 4, 2025, at 2:56 PM, owner's counsel received the following email from Douglas
33 Obana of the DPH Director's Hearing Team with representations of the parties' respective deadlines
34 apparently superseding the normal *Director's Hearing Procedures* deadlines (DPH Exhibit D, ¶10(c):

35 *"Hello Everyone,*
36 *Given the conflict with December 2nd, we have made arangments <sic> with a new hearing officer*
37 *for the original date of November 20th at 1pm since that worked with everyone initially. Briefings*
38 *are still due with the same timeline. Department briefings <sic> due 14 days in advance of the*
39 *hearing and 7 days in advance for the operator. Please let me know if anyone has and <sic>*
40 *questions and have a great day. (emphasis added) Sincerely, Douglas Obana, MPH, REHS..."*
41 *(emphasis added) (attached)*

1 The November 20, 2025 Hearing date meant that DPH's briefings were due on Thursday,
2 November 6, 2025.

3 On November 7, 2025 at **11:27 p.m.**, Douglas Obana of the DPH Director's Hearing Team
4 emailed owners' counsel an update on the identity of the new Hearing Officer with attachments described
5 as a briefing from the DPH-Massage Program entitled *Assertion of Official Information Privilege* dated
6 November 6, 2015 ("the brief") and *Declaration of Michelle Vega in Support of the City's Assertion of the*
7 *Official Information Privilege* also dated November 6, 2025 ("the declaration"), respectively.
8

9 Interestingly, the aforementioned October 22, 2025 and November 4, 2025 emails from Douglas
10 Obana of the DPH Director's Hearing Team were omitted from the DPH Chronology submitted on
11 Thursday, November 13, 2025 at 12:20 pm when DPH emailed its 75-page *Environmental Health Basis for*
12 *Proposed Enforcement Action Summary, Chronology and Exhibits* – one week past the November 6, 2025
13 deadline date that Douglas Obana of the DPH Director's Hearing Team represented on November 4, 2025
14 that they were due!
15

16 Accordingly, Owners specifically object to the entire untimely 75-page *Environmental Health Basis*
17 *for Proposed Enforcement Action Summary, Chronology and Exhibits* sent by DPH to Owners and owner's
18 counsel on November 13, 2025, one week past the past the November 6, 2025, deadline as represented by
19 Douglas Obana of the DPH Director's Hearing Team.
20

21 SPECIFIC EVIDENTIARY OBJECTIONS.

22 *California Evidence Code - EVID § 356 Rule of Completeness*

23 *"Where part of an act, declaration, conversation, or writing is given in evidence by one party,*
24 *the whole on the same subject may be inquired into by an adverse party; when a letter is read,*
25 *the answer may be given; and when a detached act, declaration, conversation, or writing*
26 *is given in evidence, any other act, declaration, conversation, or writing which is necessary*
27 *to make it understood may also be given in evidence.*
28

1 Director's Hearing Case Chronology ("DPH Chronology")

2 DPH's multiple references to the owners, Liyan Wang and Jing Huang as "**BO**" is juvenile (**BO** is a
3 reference to **Body Odor**), unprofessional, unnecessary, pejorative, offensive, and revealing of DPH's bias
4 against them. All such references should be stricken.

5 Exh. # Objection

6
7 A Page 10 - Yellow highlight emphasis was improperly added post document creation date.

8 B Page 15 Redaction on 2nd sentence of 3rd paragraph "*I utilized ____.*" Hides probative and
9 relevant information, violates *California Evidence Code* ("CEC") §356 - *Rule of Completeness*.

10 Page 16 Redaction on the 1st sentence "*I ended the record, I uploaded the photographs to this*
11 *report as well as the ____.*" Hides probative and relevant information, violates *CEC* §356 - *Rule of*
12 *Completeness*.

13
14 Page 16 2nd sentence "*I additionally placed the photos and recordings on a Scan disk.*" Hides
15 probative and relevant information, violates *CEC* §356 - *Rule of Completeness*.

16 C The NOV referenced *Incident Report 250377568*, but did not include it.

17 The quoted material does not match the *Declaration of Robert Glenn* (DPH Exhibit R)

18
19 The NOV contradictorily stated that Owner refused to sign the NOV but typed her signature in
20 anyway.

21 D Page 21 bottom – stated

22 "*Based on the finding set forth above, the Director HEREBY ORDERS: That you (Liyan Wang and*
23 *Jing Huang) and your practitioners shall immediate discontinue engaging in lewd conduct at the*
24 *Establishment...*"

25 Conclusionary: DPH alleged no findings that the owners or more than one practitioner was
26 engaged in lewd conduct.

27 H Page 39 top – stated:
28

1 “Based on the finding set forth above, the Director HEREBY ORDERS: That you (Liyan Wang and
2 Jing Huang) and your practitioners shall immediate discontinue engaging in lewd conduct at the
3 Establishment...”

4 Conclusionary: DPH alleged no findings that the owners or more than one practitioner was
5 engaged in lewd conduct.

6 I Page 44 top – stated:

7 “Based on the finding set forth above, the Director HEREBY ORDERS: That you (Liyan Wang and
8 Jing Huang) and your practitioners shall immediate discontinue engaging in lewd conduct at the
9 Establishment...”

10 Conclusionary: DPH alleged no findings that the owners or more than one practitioner was
11 engaged in lewd conduct.

12 N Page 61 top – stated:

13 “Based on the finding set forth above, the Director HEREBY ORDERS: That you (Liyan Wang and
14 Jing Huang) and your practitioners shall immediate discontinue engaging in lewd conduct at the
15 Establishment...”

16 Conclusionary: DPH alleged no findings that the owners or more than one practitioner was
17 engaged in lewd conduct.

18 Q “Declaration of Michelle Vega...”

19 Ms. Vega stated in the first ¶2 of the declaration:

20 “2. In my official capacity, I have access to records and information generated or collected by EHB
21 in the course of its enforcement activities. The material at issue in this matter, specifically,
22 information that would reveal the physical appearance and identity of an undercover agent, **has
23 been maintained as confidential at all times.**” (emphasis added)

24 The identity of the undercover agent has **not** been maintained as confidential since it was officially
25 disclosed, three (3) months ago, by DPH Code Enforcement Investigator Ivy Phan on August 12, 2025,
26 when she unconditionally transmitted partially redacted *SFPD Incident Report No. 250337568* with the
27 name of the decoy **not** redacted, to owners’ counsel me with a cc: to her work colleagues, Ivy Phan, and
28

1 Danny Lee, as well as to and their boss, Jennifer Callewaert. The same incident report and emails with the
2 named undercover agent were released to owners' counsel and the public pursuant to a *Public Records*
3 *Act* request on October 28, 2025 (DPH file name: "REDACTED RR #25-7799-3446 Balboa Street -
4 *Richmond Serenity Spa*").

5 Stating that the identity of the undercover agent has been confidential **at all times** appears to be
6 untrue.

7
8 *"3. The undercover agent whose identity is at issue is the sole operative assigned to conduct*
9 *covert investigations into illicit activity at massage establishments within the City and County of*
10 *San Francisco pursuant to San Francisco Health Code Article 29. Disclosure of the agent's*
11 *physical appearance would render him recognizable to the regulated community, thereby*
12 *compromising the integrity of ongoing and future investigations.*

13 The declarant, Ms. Vega, and her crew have been inspecting massage establishments for years.
14 Most, if not all, of the establishments have video equipment in their plain view as inspectors. This
15 equipment records all who enter. The agent's physical appearance has no doubt been recorded many
16 times; it is logical to assume that he is totally recognizable to the "*regulated community*." It is highly
17 disingenuous to represent under oath that his likeness has not been compromised.

18 *"4. Even if disclosure were subject to a carefully crafted protective order, the risk of harm remains*
19 *substantial. Once the agent's physical appearance is disclosed, it cannot be undone. Protective*
20 *orders cannot fully eliminate the risk of inadvertent disclosure or misuse, nor can they restore the*
21 *agent's anonymity once compromised. **Because the same legal counsel has historically***
22 ***represented other massage establishments that have been under investigation, there is a***
23 ***significant risk that the agent's identity could be shared with those clients, intentionally or***
24 ***not, undermining the City's broader enforcement strategy.**" (emphasis added)*

25 A declaration must contain only facts personally known to be true to the declarant, not speculation.
26 If this statement is directed towards owners' counsel, it is highly offensive and a cheap shot unworthy of a
27 world class health department. And, once again, the identity of the decoy has already been released and
28 compromised by DPH multiple times. There is no longer any expectation of confidentiality.

1 R Declaration of Robert Glenn

2 "6. Based <sic> my investigation, I believe the Serenity Spa is owned by Jin Huang and Wang Li."

3 After stating his knowledge and familiarity with the business in the previous paragraph, the
4 declarant misspelled both owners' names, impeaching his previous statements!

5 "16. Based on my training, experience and the investigation I have personally conducted,
6 I believe that the Serenity Spa is house of prostitution pursuant to Penal Code section 315."

7 Conclusionary and reckless speculation, insufficient supporting facts and evidence.

8 "18.... Because the same legal counsel represents multiple establishments currently under
9 investigation, disclosure of the agent's identity in this proceeding would likely be shared—
10 intentionally or not—with other clients, thereby undermining the City's broader enforcement
11 strategy and enabling regulated entities to evade detection."

12 Malicious speculation without foundation.

13 Dated: November 19, 2025.

14 Respectfully submitted,

15 

16 _____
17 Paul V. Horcher, Attorney for Jing Huang and
18 Liyan Wang dba Richmond Serenity Spa
19
20
21
22
23
24
25
26
27
28

SFDPH Director's Hearing - Case #MSG-25-03, 3446 Balboa St., DBA Richmond Serenity Spa-20251120 2201-1

0:02

Good afternoon, calling the order of the San Francisco Department of Public Health directors here.

0:08

Date is Thursday, November 20th, 2025 and one O 6.

0:15

I am there's hearing clerk, the hearing officer for today, Officer Tracy Lawrence CBW.

0:26

If you remember the public joining us and would like to speak our comment will be at the end of the year for public comments will be at the hearing opposite discussion and you'll be right to remain anonymous.

0:38

Please spell personal audio video recordings and only one body speaking at a time.

0:44

Please number MSG 2503 address 344650 St.

0:53

Thank you.

0:59

Good afternoon.

1:01

My name is Tracy Lawrence.

1:02

I'm an intimate hearing officer appointed by the Director of San Francisco Department of Health to conduct and decide these hearings.

1:12

This hearing is being audio and video recorded and will constitute an administrative record for each case.

1:20

The process of these proceedings in order of the presentation as follows.

1:29

The Department San Francisco Department of Program Manager.

1:34

Since the case with the burden of establishing violation within 7 minutes, the responsible party or the defendant has seven minutes to present their case, then have 3 minutes or above the documents.

1:51

At the conclusion, the department has one minute to present the post order.

1:57

These hearings are quasi judicial.

2:00

The technical rules of evidence will not apply.

2:04

Any relevant plausible evidence will be considered an admitted and will be given.

2:09

The lead is due prior to making a decision.

2:12

Here say evidence should be limited and will only be considered if it supplements or explains other evidence.

2:20

At the end of the proceedings, I will adopt, modify or reject the purpose proposed order and I will submit a written decision post hearing in accordance with the timelines dated by the Special of applicable cops.

2:37

Will everyone wish to testify, please?

2:51

Do you solemnly swear under penalty of mercury, under the law of the State of California, the testimony you give at this hearing today will be the truth, full truth, and of the truth, Yes, Yes.

3:15

OK, have a lovely time.

3:19

Good afternoon hearing Officer Lawrence, my name is Michelle Avega and I oversee the massage program here for the Department of Public Health, Environmental Health Branch, which is one of the three programs that I we're not going to do that because in the very beginning I laid the groundwork

and I stated that each side would have 7 minutes and then once they complete their 7 minutes, then you will have an opportunity to present your case.

3:44

I understand that, but you're an officer.

3:47

But I do have a pending evidentiary objection which was sent to you yesterday, which is the knowledge receiving.

3:54

I have to acknowledge that I received that.

3:55

Like I said, you can, you can say all of that and when it's your time, actually, it's logically we would be wise to disclose that now because I believe, given my objection, that the matter should be dismissed.

4:10

So the matter is not going to be dismissed.

4:12

I am going to allow the evidence to stand.

4:16

So I will allow this department to continue.

4:18

Thank you.

4:20

I've conducted enforcement work for the health department in various programs and have been with the branch for over 17 years.

4:26

I'd first like to object to the second chair being the designated interpreter.

4:31

Due to conflict of interest, the department has furnished an interpreter today through a third party vendor who can remain impartial.

4:39

This request for the interpreter was initiated by the opposing party.

4:43

The third party vendor has experience with interpreting for depositions and legal matters.

4:49

Have you heard of that?

4:51

He, I don't think that interpreter's here.

4:54

Oh, he was sitting there.

5:00

Let me do second.

5:04

No EBH was made aware that the choice to have on yesterday sometime warrant and there's nothing about that any director series procedures I'd like to go further add no merit.

5:28

Second, I'd like to also question if former Lieutenant Phil Roy will be testifying today.

5:39

So I will allow the departments interfere and then the officer will testify today.

5:51

So the the former Lieutenant Kilroy, I'm not quite sure if the opposing party has him scheduled to testify today, but I'd like to object for him to testify based on speculative reasoning and lack of qualification.

6:09

I'm starting to misunderstood that you were talking about.

6:11

I agree.

6:12

So he will not testify.

6:14

Thank you.

6:16

I beg, Mark, can we pack up here?

6:18

Who is the person who's speaking?

6:20

She did not identify her snake.

6:23

I am Michelle Avega with the Department of Public Health.

6:26

And what is our motion?

6:29

I'm sorry.

6:29

Continue Thank you.

6:31

We're here today to provide new Hearing Officer Lawrence DPH's burden of proof that solicitation and engagement of Lube Act occurred at the permitted location called Richmond Serenity Spa.

6:44

I received a call from a concerned member of the public on December 6th, 2024 regarding a massage establishment located at 3446 Bello St.

6:54

claiming that they were conducting business all hours of the night pass off the allowable hours for a massage establishment.

7:02

The complainant also claimed that the massage business was offering sexual services for compensation as several male customers were observed entering and exiting the premises.

7:12

I informed the complainant that the previous routine inspections that we had had no health code violations, but we'll reach out to our partners at SFPD Special Victims Unit to investigate this for prostitution and Ludak.

7:25

In addition to that complaint, DPHS Government Affairs liaison to the Board of Supervisors also informed us of another complaint that came through with the Board of Supervisors.

7:37

Our former Director, Patrick Fosdale then connected PD and provided that information as well.

7:43

So on June 17th, 2025, SFPD conducted an undercover by operation at 3446 Balboa St.

7:52

According to the police report, as you can see from Exhibit B and Exhibit R that was submitted, the decoy paid \$50.00 for a 30 minute massage.

8:02

During the rendering of these services, the practitioner removed the sheet that the decoy had exposing his backside and started massaging his body parts, including his buttocks.

8:16

She then proceeded to solicit ***** services for compensation in the amount of \$60 to the decoy, all while stimulating his genitals.

8:26

This is a clear violation of the San Francisco Health Code Article 29.31 and Article 29.17, which is solicitation and engagement of lewd conduct.

8:38

As you can see from the incident report and declaration, Sergeant Glenn referenced Richmond Serenity Spa as 3448 Balboa St.

8:45

However, the physical address of this location is actually 3446 Balboa St.

8:53

This discrepancy appears to be on City Assessor's Office database where they claim that this parcel is both 3446 and 3448 Balboa St.

9:03

I'd like to assure you here in Officer Lawrence that Sergeant Glenn did in fact receive the services from 3446 Balboa St.

9:11

and this will be further clarified directly from Sergeant Glenn during his testimony and direct examination today.

9:18

We also have District Inspector Ivy Fan here who has any questions that you might have pertaining to the issuance of the violation.

9:25

But at this time, I'd like to call on Sergeant Glenn to provide us his testimony on the accounts that occurred on June 17th, 2025 at Richmond Serenity Spa.

9:35

Actually have a question, Miss Megan?

9:38

No, you're cutting into their she justified.

9:40

I have a right question here.

9:44

That's right.

9:45

When you're paid by your client, I'm sorry, you're paid by your clients to represent them.

9:49

You continue to interrupt, I will ask you to leave and you will not be able to provide a service to your clients, something that they're entitled to.

9:58

I understand that.

9:59

No, it's not a lecture.

10:01

It's I'm telling you that if you keep interrupting, I'm going to ask you to leave.

10:05

So you make the decision.

10:15

I'm available now.

10:15

Sorry, I didn't know if I was not trying to talk to you, so why not?

10:25

You're ready.

10:26

I'm ready.

10:27

Sorry.

10:27

Am I going to be asked questions or do I just basically read my declaration to you guys?

10:34

Yes.

10:35

I mean, right now you read your declaration.

10:39

I started drawing the blood and Claire as follows.

10:41

I'm Sergeant and the San Francisco Police Department.

10:44

I've been a police officer with San Francisco Police Department for less than 10 years prior to working as an officer at the Police Department for almost a year and worked as an officer for the University of California San Francisco School of Law firmly UC18's safety department for almost 5 years.

11:01

I have personal knowledge to the content declaration and if called to do so would come would competently testified to the truth of the matter stated.

11:12

I have been assigned to the San Francisco Police Department Special Victims Unit for the last year.

11:17

I worked in the San Francisco Police Departments, Bayview, Ingleside, Central and Southern Districts as a patrol officer prior to my current assignment as a Sergeant at SFP's Special Victims Unit.

11:31

I investigate crimes pertaining to sexual assaults, domestic violence, child abuse, fraud, among other crimes.

11:38

During the course of my career, I've interviewed thousands of victims, suspects and witnesses.

11:42

I have also testified pulmonary hearings and jury trials.

11:45

My training includes the Basic post certification courses while attending San Francisco Police Academy and ongoing instruction throughout my career in advanced officer training courses.

11:56

I've successfully completed the following courses.

11:58

80 hour Robert Presley Institute for Criminal Investigation Basic Court course.

12:04

80 hour Police Officer Standards and Training Supervisory course.

12:08

24 hour Plainclothes and undercover operations course.

12:12

40 hour ICI Sexual Assault Investigation Courts.

12:17

40 hour ICI Human Trafficking Investigation course I'm familiar with the business called Richmond serenity Spa.

12:25

The serenity spa is a commercial business occupied on the ground floor of 3446 Balboa St.

12:33

in San Francisco, CA.

12:35

I become familiar with Serenity Spa based on the investigation.

12:39

I have personally conducted the business in conversations with SSB officers who have conducted their own investigations.

12:45

I know that Serenity Spa would be an illegal brothel in a location where illegal prostitution first.

12:52

This is based on investigation.

12:54

I've personally conducted conversations with other officers in European parts.

12:59

Based on my investigation, I believe the Serenity Spa is owned by Jen Wong and Wang Lee.

13:06

On June 17th, 2025, approximately 1600 hours, I conducted an undercover operation at the Serenity Spa.

13:16

The goal of this operation was to see if there was illegal prostitution taking place and the surrounding spa.

13:23

Wearing a mobile body bug and in possession of \$200 in Martin City funds.

13:28

I was greeted by an Asian female who had quoted me back to a room.

13:32

I did not see any other people as I walked to the room but was able to hear voices from other rooms.

13:36

The voices sounded as they were both male and female.

13:41

The room looked like a typical massage room with a chair and massage table.

13:45

There was another table in the corner that had a massage oils and a roll of toilet paper on top.

13:51

Once inside the room a woman asked me how long.

13:54

I told her I wanted 1/2 hour massage.

13:56

The female said it would cost \$50.00.

13:58

I gave the woman \$100 bill.

14:00

The woman told me she would give me change.

14:04

The woman then points to them the table.

14:06

I asked whether I should take off my clothes.

14:08

The woman said take off, pointed to a nearby chair next to the room.

14:11

I undressed, got under the blanket covering the massage table and faced out.

14:16

The woman returned to the room and put \$60.00 on the table and then removed the blanket cover.

14:21

They then began rubbing my shoulders and legs.

14:24

She then began rubbing my buttocks and then attempted to rub my perineum area, which I prevented by clenching my buttocks.

14:31

The woman then asked me to turn over, which I did.

14:34

She then began rubbing my chest and stomach.

14:36

Eventually she grabbed my penis and asked me once while making an up and down motion with her other fist.

14:44

I interpreted this gesture as an offer for manual stimulation.

14:51

I asked her how much.

14:52

She said you tell me and I offered sixty and I offered \$60.00.

14:58

The woman agreed and then to the corner table to get oil.

15:02

She then grabbed my penis and manually stimulated me with both hands.

15:06

I determined there was sufficient evidence to possible violation of California Penal Code 647-B.

15:13

I then told the woman I had to leave.

15:15

The woman told me to lay back down so that I could finish.

15:20

I again told her that I had to go and gave the woman \$50 and left.

15:24

Based on my training and experience and the investigation I personally conducted, I believe the surrounding spa is the House of Prostitution concerns Penal Code in section 315.

15:35

I am the sole operative assigned to conduct covert investigations into the lipid activity and massage establishments within the City and County of San Francisco.

15:43

Disclosure of my physical things would render be recognizable to regulated communities, thereby compromising the integrity of ongoing future investigations.

15:52

Even if disclosure were subject to carefully crafted protective order, the risk of harm remains substantial.

15:58

Once my physical appearance is closed, it cannot be undone.

16:01

Protective orders cannot fully eliminate the risk of inadvertent disclosure or misuse, nor can they restore the agency and an integrity once compromised.

16:10

Because the Family Group Council represents multiple establishments and currently under investigation, disclosure of the agent's identity and this proceedings were rightly prepared, intentionally or not, with other clients, thereby undermining the City's broader enforcement strategy and enabling regulated entities to evade detection.

16:27

Disclosure of my physical appearance identity would cause serious and lasting harm to the City's enforcement efforts.

16:32

The agent's ability to operate covertly would be irreparably impaired, and the City's capacity to enforce San Francisco Health Code Article 29 would PCs persons significantly diminished.

16:45

I declared T of perjury and the laws of the State of California that the foregoing is true and this was written on November 7th of 2024 for the Health Department.

17:05

Sergeant Glenn, can you hear me?

17:08

I'm Paul.

17:10

I'm Paul Horton.

17:11

I'm the counsel for the operators.

17:14

Did you write that declaration with the assistance of the city attorney's office?

17:18

Yes.

17:19

OK.

17:21

Now you understand that if you have corrected the address, is that correct?

17:24

I've corrected the address and I have some additional training since it was offered.

17:29

I added the additional training to Section 4.

17:32

OK, what is a, what is a by walk operation?

17:38

What is a by walk operation?

17:39

Is that question?

17:40

Yes, Sir.

17:41

It is when we go to an establishment and an effort to determine if prostitution is taking place within the establishment.

17:50

The idea behind that is that we do not do enforcement actions.

17:54

There is a signal given to the other officers that are outside and they are supposed to contact me via telephone to help me get out of there and come up with an excuse to leave.

18:06

I noticed in the in the incident report, you, you used that signal, you signaled your, your part of your team.

18:18

You put that in the incident report and but in your declaration you did not mention that.

18:22

Was there some reason for that?

18:26

I had the city attorney help me edit it and he removed it.

18:29

So I don't know why he removed it.

18:32

All right, I noticed that in the declaration that you mentioned that you worked for Ukiah Police Department, but your testimony today you did not mention that some reason for that I mentioned you got Police Department.

18:53

I read it right out of the exploration.

18:57

I beg to differ that the record will stay won't reflect that now.

19:04

Did you get a receipt when you gave the woman 5050 dollars?

19:11

I hear your question.

19:12

Can you repeat it please?

19:13

Did you get a receipt for your \$50.00?

19:16

I did.

19:19

You mentioned that you went in there and the voices were audible.

19:22

Is that correct?

19:23

From the other room, there was a man, a woman, who said that is correct, and you could clearly hear their voices.

19:33

Can you say that again?

19:34

You could clearly hear their voices.

19:38

I could faintly hear their voices, but I could hear their voices, yes.

19:43

Now, in your instant report, you mentioned that you had an audio recording.

19:50

There is an audio recording, yes.

19:52

And you mentioned you had photographs as well.

19:57

Photographs of the money, yes.

19:59

Now, the operators have asked three times for those recordings and photographs, once directly from PD and twice from the health department.

20:09

They've never, never received them.

20:12

Did you know that I'm not in charge of discovery, Sir?

20:17

It's a yes or no.

20:23

What is the question that did you know that you don't know?

20:28

I did not know.

20:28

OK.

20:29

That's all I have to say.

20:30

I don't know.

20:31

OK.

20:35

Have you ever made an arrest for prostitution?

20:39

Yes.

20:41

Why didn't you make an arrest in this case?

20:43

This actually happened because that was not the operational goals that we set forth that day.

20:50

Who set the goals?

20:52

Inspector Flores?

20:55

What's that?

20:56

Who set the goal of this operation?

20:59

I did.

21:01

You did.

21:04

Isn't your job to protect public safety among other things?

21:10

Yes, it's your job.

21:12

If you've witnessed a crime, it isn't your job to detain the person.

21:17

At least identify who they are.

21:19

Thank you.

21:22

How does it jeopardize A broader investigation?

21:27

How about wasn't your job at least identify other people who were in the room and could have asked who those people were?

21:32

Or if you were overheard speaking, that would have jeopardized the investigation.

21:38

So we did not do that.

21:40

How about public health concerns?

21:42

Wouldn't it have been wise if alerted the operators?

21:45

Hey, look, you've got a rogue masseuse in your place.

21:47

You better just do something about it.

21:49

You're jeopardizing public health.

21:52

Wouldn't it have been a good idea?

21:56

I don't agree with that statement.

21:57

Now, you don't agree with that statement.

22:00

OK.

22:02

Isn't it true the District Attorney has never pursued criminal charges in this matter?

22:08

The best case number, 250337568, did you not receive criminal complaint from us?

22:14

That is correct.

22:16

Thank you.

22:17

All right, so this date, you don't know who that person was that correct that you encountered?

22:30

I'm sorry, you don't.

22:32

To this date, you do not know who that person was who you encountered on June 17th at 3446 Balboa St.

22:42

That that is correct.

22:55

What is a mobile body bug?

22:58

What is a mobile body bug?

23:00

I'm going to exercise 1040 of the evidence code and not disclose that to you because they would jeopardize further investigations.

23:06

You can't describe what a mobile body bug is.

23:12

I just answered your question, Sir.

23:15

OK, You're not going to tell me.

23:17

All right, One moment.

23:27

Yes.

23:37

I want to ask you something else.

23:43

Have you ever been listed on the Ukiah Police Department's Brady list?

23:49

Not to my knowledge.

23:50

Yeah.

23:51

Also known as a Giglio list.

23:55

Known as a what?

23:56

Giglio.

23:56

Giglio list?

24:00

Not to my knowledge.

24:01

You don't know anything about that, then, correct?

24:09

That's correct.

24:12

All right.

24:12

I see something else.

24:14

You'd be able to die.

24:14

I don't know.

24:16

Were you one of the four officers who arrested a burglary suspect?

24:20

Excuse me?

24:20

A kidnapping suspect and allowed him into the jailhouse with a loaded weapon?

24:26

It was not.

24:29

Now, it was a supervisor.

24:31

That incident, though, one more question.

24:41

For cross examining and presented my case.

24:49

If you're just asking questions, do you have anything additional that you want to add about your case just cross examining their witness presented by case yet you had some events to do that.

25:01

Oh, I have not cross examining you got and if the hearing officer.

25:14

Got to give her a fair hearing.

25:16

Well, this is a fair hearing.

25:18

Well, we are giving you a fair hearing in your opinion.

25:26

So I'm saying that we're question aspect of this, but I am going to allow you some time to prevent your case.

25:33

I'm going to give you 3 additional minutes to do that.

25:36

Thank you.

25:37

One last question of the of the in deputy.

25:40

No, it's time to move on.

25:45

So I can't ask him about his four day suspension Relevant.

25:49

It's relevant as to carelessness.

25:52

OK.

25:54

And I want to bring on my expert witness, Lieutenant Greg Pillow.

26:02

Oh, no, I'm sorry.

26:03

I could absolutely cannot testify.

26:07

I think you can wish to testify.

26:09

You said three more seconds.

26:10

No, but this is, you can see your case not bringing a witness.

26:14

Oh, come on.

26:15

No, I I think we have said the very beginning.

26:18

Oh, you did not.

26:19

We did.

26:20

She asked and I said that I will not allow him to testify.

26:23

You can't do this.

26:25

You may think you can do this, but it's extremely arbitrary.

26:28

Gracious you have some of these women have their credits.

26:31

So this is a very hearing.

26:32

Just give me 3 minutes.

26:34

My 3 minutes is to ask this gentleman give this opinion.

26:37

He's an expert of witness opinion.

26:40

So I and I also said before that I'm not going to allow that in the very beginning.

26:45

So do you even hear that?

26:46

Do you have any additional information for that?

26:51

How about a 5 minute break and I'll give my 3 minute summation.

26:55

Would that be OK?

26:59

Yes please.

27:01

My audio is today.

27:02

I can't hear anything from anybody.

27:03

Sorry, I'm interrupting.

29:59

3 minutes left.

29:59

I'd like to have my client stay so after I asked one question of Miss Vega.

30:12

So first I want your clients to present to receive your statement and then the rebuttal will allow you to ask questions.

30:20

Sorry.

30:22

I will allow you to ask questions after your client has seen your statement.

30:28

Thank your statement.

30:29

I tried English SO in the past six months and there are hundreds of ladies women no make them

comment on our website, so most they give us the e-mail and phone numbers, many become regulars.

31:03

So since May all of our review our Google and our five stars.

31:13

Why?

31:15

Because the one reason they feel here and comfortable, they told told me that the spark feels is different than the from the other spark.

31:31

If you fix our spark, you will see the curtain wide open is very clean and there is a sitting area comfortable area in next window to our employee network.

31:53

Wear sexy clothes, so I use my real name as my client.

32:02

There are pictures of me and my partner and show the website.

32:10

I think better spot never do that.

32:13

So we put in there more than 70 sourcing on the modeling and also 50 more than 50 sourcing for the marketing.

32:34

We choose the hard path but it's our dream to have a spa that gives the lady couples and a good man affordable luxury.

32:53

We try to keep a wee bad man like Decoy.

32:59

They think all the Asian mushrooms are class to schools.

33:11

Firm publishing also start from the Police Department.

33:17

Has made me feel really really tired and almost give up.

33:26

I have a serious housing problem and not much money.

33:33

Now you know I'm their owner then I believe we know any landlord want to illegal business on their property.

33:48

That's really stupid I'm sorry.

33:51

I hope you.

34:03

I hope you last continue to take care of good people who love our star.

34:09

Thank you very much.

34:15

Thank you.

34:23

She has time.

34:25

Sure.

34:25

Go for it.

34:31

Go ahead.

34:31

Later.

34:31

OK.

34:33

Gary.

34:33

Gary.

34:33
Officer.

34:34
So I'm.

34:35
I'm here Doctor about you know our we hired all the employee and mostly around you know, 60 years old and no criminal record and all were certified by CMTC.

34:49
And then we always tell them do not do anything against the law.

34:53
Also, you know, we spend a lot of money, you know, and build nice website and Google ads ads on the Google to get more women and a couple massage and facial customer.

35:06
So then DPH charge us with, you know, prostitution only based on an untrue writing report from policeman and want to revoke our business permit and our personal license.

35:20
So I think that's ridiculous and also it's unbiased because we didn't do anything against the law, you know.

35:29
Also, you know, the, the money from the business is only our income now.

35:34
So you know, also now you, you try to revoke our licenses so you know, if without a permit and CMTC license, you know and make us cannot make a living.

35:50
So we are in nursing and don't deserve this visible punishment.

35:58
So this is everyone.

36:03
Thank you.

36:06
Wanted to say after there's David you can ask a question.

36:13
Thank you.

36:14

Begum, you said a concerned member community called you on December 6th, 2024.

36:23

Who you described as the complainant was that person in fact the upstairs neighbor of Richland Serenity Spa located at 3448.

36:40

The complainant would like to remain anonymous that far as that information provided today.

36:45

Fair enough, got my answer thank you.

36:48

I would love the department to to so I I do understand that based on the declaration provided by owner James Wang that it appears that she's stating that they're targeting couples and women, which is 50% of their patrons.

37:15

Yet for some reason 50% of them are men alone.

37:22

I questioned as to how these men even find out about this location.

37:26

Less than 10% of the Google generated reservations are men, yet 50% of your clientele are are men.

37:34

So where are where are these men making their their looking their services?

37:44

I would also like to question that there are rumors that there's escorts, that this, this is not a rogue agent, an individual that's conducting these services when in fact we believe that it is the practitioners, the establishment itself doing servicing these types of good acts.

38:07

During my rebuttal, I would like to at this time like to direct examine Sergeant Glenn, if that is OK.

38:17

OK, so Sergeant Glenn, can you tell us what initiated your investigation with Richmond Serenity Spa?

38:33

I'm sorry, can you hear me?

38:35

Yes, sorry.

38:37

We we received a complaint from the Department of Public Health as well as from the citizens.

38:43

OK.

38:44

At this time, although your incident report declares in states 3448 Elbow St., you entered Richmond Serenity Spa front entrance depicted on exhibit.

39:00

Let's see Exhibit A page 12, is that correct?

39:10

Exhibit A page 12, which is the Google, the Google image of what we had provided you the other day.

39:17

Yes, that is correct.

39:20

So have you ever received any personal massages before outside of that location?

39:27

Yes.

39:27

I How many can you say you've gotten during your personal time?

39:32

How many personal massages have you gotten during your personal time?

39:35

I don't have a picture all the way around.

39:37

The dozen.

39:40

Are you familiar with the common protocols and preparing for professional massage?

39:45

Yes.

39:46

And in your personal experience of getting a professional massage, is it common as a customer to

remove all clothing, including your undergarments before laying on a massage table underneath the feet?

39:56

Yes.

39:57

And is it common for a practitioner to completely remove the towel covering or sheet on the private parts during a professional massage?

40:06

I'd like to request an extension.

40:09

Go ahead.

40:11

No.

40:12

OK.

40:14

I'd like to point out here Officer Thompson that regardless if he had no undergarments or not, or had undergarments, his towel sheet should not have been removed from that decoy exposing his buttocks.

40:27

This is a clear violation of San Francisco Health Book Article 2917 and is considered a lewd conduct for the mere fact that the practitioner displayed and exposed the decoys buttocks.

40:38

Now, going back to your testimony, you you're testifying under penalty of perjury that you lay face down on the massage table fully naked underneath the sheet, which the practitioner then completely removed, exposing your entire backside as you lay face down on the table.

40:53

Is that correct?

40:55

That is correct.

40:56

Did you ask her to remove the cover or expose your buttocks?

41:00

I did not.

41:01

Furthermore, did you ask her to massage your buttocks and fondle with your perineum or attempted to fondle with your perineum?

41:08

No Based on your professional experience, did a lewd act occur at this point?

41:15

Yes.

41:17

What's the reason why you continue to do your undercover operation at this point?

41:22

The undercover operation was in regards to prostitution and the massage parlor, so why did you continue on?

41:30

So you thought the lewd conduct?

41:32

Why did you continue on?

41:34

Lewd conduct and prostitution are two separate In what kind of sections Were you trying to obtain solicitation at that point?

41:41

Correct?

41:43

OK, I'd like to also revisit the services given to you once you were asked to turn over on the massage table fixing up.

41:50

Can you confirm once again Underoath that your genitals were exposed during this time?

41:56

They were.

41:57

And during this time, while grabbing your genitals, she solicited A lewd service on your genitals for \$60.00.

42:04

Is that correct?

42:06

That is correct.

42:07

In your testimony, you state that manual stimulated you with both hands.

42:11

Can you briefly explain to us exactly what you mean by manuals manually stimulating you with both hands?

42:19

One hand grasps my testicles, the other hand grasps my penis and strokes in an up and down motion.

42:24

So basically, she clearly was ***** you at this point.

42:29

Yes, I had already given the.

42:30

I'm sorry.

42:33

OK, Yes, OK, great.

42:34

So at this point you were attempting to stop the service and told her that you had to leave, correct?

42:40

Yes.

42:41

Once the sorry why?

42:44

Why did you why did you stop the decoy operation here at this point and not earlier on?

42:50

We were attempting to get the solicitation for prostitution.

42:54

Once the solicitation was done, I gave the signal to my undercover officer to call the form and once they called the phone, I was able to get away from her in regards to that.

43:07

OK, thank you.

43:09

Sergeant Glenn, I have no further questions.

43:13

Follow up, please.

43:14

eBay.

43:16

Sergeant Glenn, this is Paul Archer again.

43:19

You know the law about 6647-B pretty well, don't you?

43:22

One more time, talk about 647-B prostitution.

43:30

Isn't it true that when you agreed to \$60.00 fee, that's when the that's when the crime of prostitution was complete, Isn't that true?

43:40

That is true.

43:41

There was no need to go any further.

43:43

Isn't that true?

43:46

There was no attempt to go any further.

43:48

Oh no, you went further.

43:51

You had this moment stroke you and I assume was an erect penis, is that correct?

43:57

That is incorrect.

43:59

No, you went further.

44:01

We're reading your.

44:02

It is what it is.

44:02

We're reading your it's a report.

44:05

Well, you said I had a direct peanut.

44:07

That's incorrect.

44:08

Secondly, we had a given to kill sign already.

44:10

So that is I was waiting for the phone call to come in.

44:14

So no, it was not.

44:16

It's my one million daughter would say it is what it is.

44:18

We're reading your we're reading your incident report.

44:22

I offered her \$60.00 and she said yes.

44:26

That's when you established prostitution.

44:28

Isn't that correct, Sir?

44:30

You're talking over me while I'm answering your questions.

44:33

You're not answering my question.

44:34

You're trying to dodge it.

44:35

Please answer the question for the hearing officer.

44:40

Your turn.

44:41

Officer I What is the question?

44:45

I'll say it again.

44:48

When you agreed to the \$60.00 at that time, was not the crime of prostitution established?

44:59

That is the current prostitution, Yes.

45:02

Thank you.

45:05

Did she take your underwear off?

45:10

No, you took your underwear off.

45:12

That was your decision, is that correct?

45:16

Yes.

45:17

When I entered the room, I asked, so I take my clothes off and she said yes, President.

45:20

And when you took the shirt, it was your decision, was it not?

45:28

Yes.

45:30

Thank you.

45:41

I think.

45:42

Thank you.

45:45

See your address in from your case.

45:48

Well, yes, OK, thank you.

45:53

Thanks for extra time.

45:54

Anything else from the page?

45:59

I'd like to provide a closing remark, please.

46:02

Thank you, young Officer Lawrence for your time and attention to this matter today.

46:07

The evidence and testimony presented today you've no doubt that serious violations of Article 29 of the San Francisco Health Code occurred at Richard Serenity Spa, located at 3446 Bubble History.

46:18

A practitioner, an employee of the establishment, engaged in a lewd conduct and solicited sexual services in an in exchange for compensation actions that are unequivocally permitted under the law.

46:30

Specifically, the practitioner exposed the buttocks, the genitals of the decoy, and proceeded to fondle those areas while explicitly agreeing to the performer Lewd Act for \$60.00.

46:40

This conduct is not only unlawful, it is a direct threat to public health, safety, and the integrity of licensed massage establishments here in San Francisco.

46:50

I want to make it absolutely clear that the Department's recommendation is based solely on the violations that occurred at this specific location.

46:57

AT3446 by lowest St.

46:59

under permit number ME120465.

47:03

Any prior history of any other locations in this decision, nor any clerical error on a piece of paper or any issues of public records or any declaration from a former PD officer who is attempting to discredit my witness with alleged knowledge of how we run our operation here in this department should have no bearing in this matter.

47:26

All this is irrelevant information and should bear no way to the matter of fact that the massage practitioner from this facility, who is permitted by the health department who we educated ourselves during the issuance of this permit about the practitioner conduct, did in fact engage in the lewd act, solicited and solicited A lewd act on June 17th, 2025 at Richmond Serenity Swap.

47:52

Given the laws that the the law does not give leeway to such egregious violations is the department's, the department provided the evidence supporting it and we respectfully urge you to uphold the department's recommendation.

48:09

Thank you.

48:10

Last word.

48:11

Yes, thank you.

48:14

The best evidence what happened would be the photographs and the audio recording.

48:21

For reasons unknown, Police Department and Health department have refused.

48:29

Turn US, turn them over to us.

48:31

We have repeatedly requested them, and you'll see that in our exhibits.

48:38

Let's see they update exactly which exhibits number Exhibits number G8.

48:50

I are the operators.

48:54

We believe that the audio recording would tell a different story.

48:58

This is why they have not been released to us.

49:00

We believe the audio recordings would be exculpatory and clear would definitely clear the air the situation.

49:08

This is why they don't release them.

49:11

This is now you have to look at things that they don't want to talk about.

49:19

They I don't know what they're complaining about here.

49:21

What you just said.

49:23

They in several times, if you've noticed in the their pleadings, recent pleadings, they dropped pick me personally saying I would do something like expose this decoy's identity, his facial recognition or whatever to other people.

49:38

We never did that.

49:39

I do and I take personal exception very angry about that.

49:43

Let's get on prepared about me.

49:44

Let's talk about these two ladies.

49:47

What's going on here?

49:49

This you've got to remember, the decoy did not identify the West's.

49:53

He did not question them in this masseuse, but the masseuse, he did not detain the masseuse.

49:59

He did not arrest the masseuse.

50:01

There were other people there he should have identified.

50:03

He didn't do it.

50:05

He did not alert the operators.

50:07

They you've got, you've got a problem here.

50:09

You've got a wrong masseuse and and SFPD did not alert the operators.

50:15

No one did.

50:16

DPS did not alert them.

50:18

No one gave it.

50:20

They cared about public health or public safety.

50:23

They went on for a month before these these two ladies found out the hard way whose Nov had noticed a violation and the secretary never pursued criminal charges.

50:34

This man, this is a this is like a big doughnut.

50:37

It's the Bible of a doughnut.

50:39

There's nothing in there.

50:40

So it looks like to us, it looks like it's everything.

50:44

Nothing to do with public safety and public health, everything to do with ambition and money.

50:51

They pointed out in the declaration this officer Glenn makes more money on overtime and he does under standard pay.

51:00

I believe he makes like 139,000 standard pay, 140,000 overtime.

51:06

They start these depot operations always at 4:00 PM, just when overtime kicks in.

51:12

I don't think they've got an axe to grind against these two ladies, but I think it's just all about the money and it should be.

51:18

It should get their priorities reoriented, reject public safety, protect public health.

51:24

So this meanness to think which we worry about is racially attached.

51:30

Thank you.

51:33

Thank you to the worries.

51:35

That's a moment.

51:36

Conclude the sentences of the department Public Accounts Director King.

51:43

Today's development is Thursday, November 20, and the time is 157.

51:48

Thank you.

BRIEF SUBMITTED BY RESPONDENT DEPARTMENT

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10 SAN FRANCISCO BOARD OF APPEALS

11 JING HUANG and LIYAN WANG, DBA
12 RICHMOND SERENITY SPA

13 Appellants,

14 vs.

15 CITY AND COUNTY OF SAN FRANCISCO
16 DEPARTMENT OF PUBLIC HEALTH,

17 Respondent.

Appeal No. 25-059

RESPONDENT’S OPPOSITION TO
APPELLANTS’ BRIEF REQUESTING THAT
THE BOARD REVERSE DPH’S DECISION TO
REVOKE THE SPA’S MASSAGE LICENSE AND
DISMISS THE ACTION WITH PREJUDICE

18
19 INTRODUCTION

20
21 On June 17, 2025, as part of a coordinated undercover enforcement operation, a San Francisco
22 Police sergeant went to the Richmond Serenity Spa, where a masseuse touched his perineum and penis
23 and offered to provide manual sexual stimulation (a “hand job”) in exchange for \$60.00. Following a
24 robust evidentiary hearing, a Department of Public Health (“DPH”) hearing officer issued a Director’s
25 Order finding that Appellants Jing Huang and Liyan Wang, the Richmond Serenity Spa’s massage
26 permit holders, violated the San Francisco Health Code when their masseuse sexually solicited and
27 engaged in lewd conduct with the San Francisco police sergeant. The Order revoked Appellants’
28 Massage Establishment permit, prohibited Appellants from obtaining a permit for five years, and

1 ordered Appellants to pay \$7,500 in administrative penalties. Appellants appeal the Director’s Order
2 and claim a due process violation that deprived them of a fair hearing. This claim is meritless, and the
3 Order should be upheld.

4 **STATEMENT OF FACTS**

5 On July 16, 2025, DPH issued Appellants a Notice of Violation /Inspection Report (“NOV” or
6 “Inspection Report”) based on a June 17, 2025, San Francisco Police Department (“SFPD”) Incident
7 Report. (Declaration of Jennifer Callewaert (“Callewaert Decl.”) Ex. 1 [Environmental Health Basis
8 for Proposed Enforcement Action Summary] at Ex. C, pp. 17-20.) The SFPD Incident Report
9 indicated that Sergeant Robert Glenn went to Richmond Serenity Spa located at 3446 Balboa Street in
10 San Francisco as the decoy officer in an undercover operation. While there, a masseuse touched
11 Sergeant Glenn’s perineum and penis and offered to provide manual sexual stimulation (a “hand job”)
12 in exchange for \$60.00. (Appellants’ Ex. 4; Callewaert Decl. Ex. 1 at Ex. R, pp. 71-74.) The DPH
13 NOV informed Appellants this conduct violated San Francisco Health Code sections 29.17(b) and
14 29.31(f) prohibiting lewd conduct at massage establishments. Richmond Serenity Spa is a permitted
15 massage establishment run by Appellants. (Callewaert Decl. Ex. 1 at Ex. A, p. 11.)

16 On July 21, 2025, DPH issued a Notice of Determination to Appellants based on the violations
17 described in the NOV. (Callewaert Decl. Ex. 1 at Ex. D, pp. 21-22.) The Notice of Determination
18 included a form to request a Director’s Hearing and explained the rules governing the hearing. (*Id.* at
19 23-26.) This information was hand-delivered and mailed to Appellants. (Callewaert Decl. Ex. 1 at Ex.
20 E, p. 30.) Appellants requested a Director’s Hearing. (Callewaert Decl. Ex. 1 at Ex. F, p. 33.) DPH
21 then amended the Notice of Determination several times due to administrative errors. (Callewaert
22 Decl. Ex. 2; Callewaert Decl. Ex. 1 at Exs. H, I, and N.) Ultimately the October 14, 2025 Notice of
23 Determination became the operative Notice. (Callewaert Decl. Ex. 1 at Ex. N, pp. 60-61.) The
24 Director’s Hearing was thus delayed to November 20, 2025. (Callewaert Decl. Ex. 1 at Ex. L, p. 55.)
25 Pursuant to the Director’s Hearing Procedure Rules, on November 12, 2025, the parties submitted
26 written submittals to assigned Hearing Officer Traci Lawrence from the San Francisco Department of
27 Public Works five business days before the hearing. (Appellants’ Ex. 11.)

1 The Director’s Hearing took place on November 20, 2025. Hearing Officer Lawrence started
2 the hearing by reiterating that each side would have seven minutes to present their case and three
3 minutes per side for rebuttal. (Appellants’ Exs. 9 and 13 at minute 1:20-1:51.) She explained that the
4 rules of evidence did not apply. (*Id.* at minute 2.) Sergeant Glenn’s identity was disclosed, and he
5 testified and was cross-examined by Appellants’ counsel. (Appellants’ Exs. 9 and 13; Callewaert Decl.
6 Ex. 1 at Ex. R, pp. 71-74.) Hearing Officer Lawrence did not allow testimony from Appellant’s
7 proffered expert Raymond Kilroy, a retired police officer. (Appellants’ Exs. 9 and 13 at minute 5:51-
8 6:14 and 25:54-26:40; Appellants’ Ex. 10 ¶ 2.) Appellants had previously submitted Kilroy’s October
9 9, 2025 declaration to Hearing Officer Lawrence on November 12, 2025. (Appellants’ Exs. 10 and
10 11.)

11 On December 19, 2025, Hearing Officer Lawrence issued her Director’s Hearing Order
12 upholding DPH’s determination that Appellants had violated San Francisco Health Code sections
13 29.17(b) and 29.31(f). (Appellants’ Ex. 1.)

14 ARGUMENT

15 I. THE BOARD OF APPEALS SHOULD UPHOLD THE DECEMBER 19 DIRECTOR’S 16 HEARING ORDER.

17 San Francisco Health Code section 29.17(b) prohibits lewd conduct and prostitution by
18 massage practitioners, including fondling the anus or genitals of another human. Appellants are
19 responsible for their masseuse’s lewd conduct and sexual solicitation of Sergeant Glenn. “Massage
20 Establishments shall be responsible for the conduct of all individuals providing Massage for
21 Compensation on their business premises and shall ensure that such individuals do not... engage in
22 lewd conduct as set forth in Section 29.17.” (Health Code § 29.31(f).) Appellants hold the permit for
23 the massage establishment and are responsible for the behavior of their employees. (Callewaert Decl.
24 Ex. 1 at Ex. A, p. 11.) Such regulation exists to protect the health and safety of the community and to
25 protect victims of the sex trade where human trafficking is often a concern. (S.F. Health Code §
26 29.1(e).) The evidence of lewd conduct and solicitation is undisputed. The June 17, 2025 SFPD
27 Incident Report and testimony by Sergeant Glenn at the Director’s Hearing establish that a masseuse
28 engaged in lewd conduct and solicitation. (Appellants’ Exs. 4, 9, and 13; Callewaert Decl. Ex. 1 at Ex.

1 R, pp. 71-74.) Appellants have provided no evidence to the contrary—Appellants did not introduce the
2 testimony of the masseuse to contradict the officer. While they argued that the police were motivated
3 by the prospect of overtime pay and that the lewd conduct continued longer than necessary, neither
4 argument bears on whether the solicitation and lewd conduct occurred as described.

5 It was proper for the Hearing Officer to revoke Appellants’ permit for five years and assess
6 \$7,500 of administrative penalties. Following a hearing, DPH may revoke a massage establishment
7 permit if it finds that the permittee’s employee has violated Article 29 of the Health Code governing
8 massage, including through lewd conduct. (S.F. Health Code § 29.33(a)(3).) And, under section
9 29.45(a)(12)(B), permit revocation of a massage business for five years is mandatory under section
10 27.17(b) when lewd conduct has been proven. DPH can also assess administrative penalties. Section
11 29.45(a)(3) provides for a \$5,000 penalty for solicitation of lewd conduct and section 29.45(a)(12)(A)
12 provides for a \$2,500 penalty for anyone engaged in lewd conduct on the premises, both penalties to
13 be paid by the massage business permittee.

14 **II. DUE PROCESS WAS FOLLOWED AT THE DPH DIRECTOR’S HEARING, AND**
15 **THE HEARING DID NOT RESULT IN A MISCARRIAGE OF JUSTICE.**

16 To set aside the Hearing Officer order on due process grounds, Appellants must prove both
17 error and a miscarriage of justice. “No judgment shall be set aside, or new trial granted, in any cause,
18 on the ground of misdirection of the jury, or of the improper admission or rejection of evidence, or for
19 any error as to any matter of pleading, or for any error as to any matter of procedure, unless, after an
20 examination of the entire cause, including the evidence, the court shall be of the opinion that the error
21 complained of has resulted in a miscarriage of justice.” (Cal. Const., art. VI, § 13.) To set aside an
22 administrative decision based on an evidentiary error, “it must be reasonably probable a more
23 favorable result would have been reached absent the error.” (*Miller v. Department of Real Estate*
24 (2022) 84 Cal.App.5th 141, 156.) Even violation of a statutory requirement does not necessitate
25 reversal absent a miscarriage of justice. (*Leal v. Gourley* (2002) 100 Cal.App.4th 963, 968.)

26 Appellants make eight claims of error: 1) DPH retaliated against Appellants by increasing the
27 penalty to revocation after sending its initial Notice of Determination; 2) DPH did not produce the
28 SFPD recording of the incident; 3) Appellants’ expert witness was improperly excluded; 4) there were

1 unlawful ex parte communications between DPH and the Hearing Officer; 5) the Hearing Officer was
2 biased; 6) Appellants were given insufficient time to present their case; 7) the recording of the hearing
3 was deficient; 8) the Hearing Officer failed to adequately state the reasons for the decision; and 9) the
4 police engaged in misconduct. Appellants' allegations are unfounded. Even if the violations
5 complained of were error, it is not reasonably probable that any hearing officer would reach a more
6 favorable result because DPH proved that lewd conduct and solicitation had occurred.

7 **A. The Amended Notice of Determination was not retaliatory and did not impact**
8 **Appellants' due process rights.**

9 DPH amended its Notice of Determination several times due to administrative errors that had
10 no impact on Appellants' due process rights. DPH staff increased the penalty to revocation after
11 determining that the initial Notice had not sought revocation. (Callewaert Decl. Ex. 2 [9/2/25 emails
12 from Phan to Horcher and Vega to Horcher]; S.F. Health Code §§ 29.17, 29.33(a)(3), 29.45(a)(12).) In
13 response to the errors, DPH continued the hearing multiple times. DPH gave Appellants their fully
14 allotted time to prepare for the hearing. There is no evidence of retaliation. Nor can Appellants show
15 that the amendment of the Notice affected their ability to prepare for the hearing.

16 **B. DPH did not possess or rely upon the undercover recording, and Appellants'**
17 **apparent failure to request the recording from SFPD is their error.**

18 DPH did not have the recording of the June 17, 2025 undercover operation or rely on it in the
19 hearing. Appellants never requested the recording from SFPD. These facts are fatal to Appellants' due
20 process argument. Prior to the hearing, Appellants sought recordings of the incident from DPH.
21 (Appellants' Ex. 8 requests to DPH dated July 27, 2025 and October 7, 2025.) Appellants concede that
22 DPH informed them that it was "not in possession of the photo or video mentioned in the [police]
23 incident report." (Appellants' Ex. 2 at A.) While Appellants claim they also asked the San Francisco
24 Police Department for the recording of the undercover operation (Appellants' brief at 4:12-15), the
25 only evidence they submitted is an Incident Report Request. (Appellants' Ex. 8.) Appellants received
26 the incident report. (Appellants' Ex. 4.) A request for an incident report is not a request for an audio
27 recording.

1 It is true that an administrative hearing officer may not rely on evidence that was never
2 provided to the accused. (*Teacher v. California Western School of Law* (2022) 77 Cal.App.5th 111,
3 137.) However, DPH did not rely on the recording of the undercover operation in prosecuting the case,
4 nor did Hearing Officer Lawrence rely on the recording to make her determination. Indeed, the
5 Director’s Hearing Order was based on the truth of the findings in the Inspection Report (Appellants’
6 Ex. 1 at p. 1), and the Inspection Report relies on San Francisco Police Department Incident Report
7 No. 250337568 (Callewaert Decl. Ex. 1 at Ex. C, pp. 17-18). Appellants cannot prove a due process
8 violation when the evidence not produced was not relied upon in any way.

9 Appellants could have obtained the recording from SFPD if they had wanted to use that
10 recording at the hearing. Their failure to request the recording from SFPD is their own mistake, not a
11 violation of their due process rights.

12 **C. Appellants’ expert’s testimony was considered and was irrelevant.**

13 The Hearing Officer received Appellants’ expert’s testimony via declaration, had discretion to
14 exclude oral testimony, and it is improbable that a more favorable result would have been reached
15 even if the expert gave oral testimony.

16 In administrative proceedings, affidavits have the same effect as oral testimony. (Gov. Code, §
17 11514(a).) Appellants had already submitted their professed expert Kilroy’s October 9, 2025
18 declaration to Hearing Officer Lawrence on November 12, 2025. (Appellants’ Exs. 10 and 11.)
19 Appellants do not allege that Kilroy had additional opinions to convey outside of those in his
20 declaration (Appellant’s Brief at 7-8). Accordingly, Kilroy’s testimony was not excluded.

21 The Hearing Officer properly excluded oral testimony because of its undue consumption of
22 time and lack of probative value. “Any relevant evidence shall be admitted if it is the sort of evidence
23 on which responsible persons are accustomed to rely in the conduct of serious affairs.” (Gov. Code, §
24 11513(c).) But “the presiding officer has discretion to exclude evidence if its probative value is
25 substantially outweighed by the probability that its admission will necessitate undue consumption of
26 time.” (Gov. Code, § 11513(f).) The instant hearing was running long at the point at which the hearing
27 officer excluded Kilroy’s oral testimony. (Appellants’ Exs. 10, 9, 13.) Further, the opinions set forth in
28 his declaration, based on his experience with SFPD 25 years ago, did not bear on the factual question

1 of whether Appellants' masseuse engaged in a lewd act and solicitation. In his declaration, Kilroy
2 testified that 4 p.m. undercover operations are performed by police officers to collect overtime pay,
3 that it was unusual for an officer to allow a masseuse to touch his genitals, and that it was unusual that
4 police did not make arrests. (Appellants' Ex. 10 ¶¶ 4, 7, 9-11.) Even assuming that these statements
5 are true, they pertain to complaints about police procedures for undercover operations, not whether a
6 lewd act or solicitation occurred at Richmond Serenity Spa on June 17, 2025. Kilroy goes on to opine
7 that massage establishment owners should not be responsible for the acts of their employees and that
8 permit revocation should not occur for one incident. (Appellants' Ex. 10 ¶¶ 13, 14.) However, these
9 opinions are both improper legal opinions and contradicted by the relevant statutes. Massage
10 establishment owners are responsible for the conduct of individuals providing massage at their
11 establishments. (S.F. Health Code § 29.31(f).) Following a hearing, DPH may revoke the permit for a
12 massage establishment if one of the employees or independent contractors engages in "any conduct"
13 that violates Article 29, including lewd conduct. (S.F. Health Code § 29.33(a)(3).) Permit revocation
14 does not require multiple instances of lewd conduct. (S.F. Health Code § 29.45(a)(12).) Clearly,
15 Kilroy's testimony lacked any probative value in a hearing with tight time constraints.

16 Even if the Board of Appeals finds that the Hearing Officer should have allowed Kilroy's oral
17 testimony, his opinion is unlikely to have resulted in an order in favor of Appellants. To set aside
18 administrative decision based on evidentiary ruling, "it must be reasonably probable a more favorable
19 result would have been reached absent the error." (*Miller v. Department of Real Estate* (2022) 84
20 Cal.App.5th 141, 156.) As discussed above, Kilroy's opinion is based on (1) a critique of police
21 undercover procedure and not whether the lewd act occurred and (2) his thoughts about the correct
22 consequences for massage establishment owners that do not comport with the law. These irrelevant
23 and inaccurate opinions would not have led to a different decision by the Hearing Officer.

24 Of course, the Board of Appeals has discretion to consider oral testimony from Kilroy, so if the
25 exclusion of his oral testimony was error, it can be cured.

26 **D. DPH's communications with the Hearing Officer were not unlawful.**

27 DPH prosecutors and Hearing Officer did not have direct communication, and the questions
28 asked by Hearing Officer Lawrence before the hearing did not result in a miscarriage of justice. The

1 “combination of investigative, prosecutorial, and adjudicatory functions within a single administrative
2 agency does not create an unacceptable risk of bias and thus does not violate the due process rights of
3 individuals who are subjected to agency prosecutions.” (*Morongo Band of Mission Indians v. State*
4 *Water Resources Control Bd.* (2009) 45 Cal.4th 731, 737.) According to the California Supreme
5 Court, an agency staff member who is not designated as a prosecutor can both participate in an
6 investigation of possible wrongdoing by a licensee and then furnish ex parte advice to the decision-
7 making body without violating due process. (*Today's Fresh Start, Inc. v. Los Angeles County Office of*
8 *Education* (2013) 57 Cal.4th 197, 223-224.)

9 Here, there was more separation of functions than in *Today's Fresh Start*. Traci Lawrence from
10 the San Francisco Department of Public Works served as the hearing officer. Michelle Vega and Ivy
11 Phan from DPH's Retail Tobacco, Massage, and Consumer Protection Program served as investigators
12 and prosecutors. Eurich Santiago and Douglas Obana from DPH's Water Quality Program served as
13 the liaison for Hearing Officer Lawrence to transmit briefing and information. (Appellants' Ex. 11.)
14 No direct communication occurred between Hearing Officer Lawrence and Vega and Phan. (*Id.*) This
15 contrasts with *Nightlife Partners v. City of Beverly Hills*, cited by Appellants, where the same person
16 prosecuted the case and advised the hearing officer. (*Nightlife Partners* (2003) 108 Cal.App.4th 81,
17 90.)

18 While Santiago and Obana were allowed to advise Hearing Officer Lawrence, they didn't.
19 Rather they simply submitted briefing and answered basic factual questions. Santiago and Obana's
20 communications with Hearing Officer Lawrence consisted of the following: On November 12, 2025,
21 Santiago sent Lawrence DPH briefing for the case that was also sent to Appellants. (*Id.*; Appellants'
22 Ex. 13 at p. 2.) Later that morning, Lawrence asked Santiago if the cases were confidential, and
23 Santiago responded that hearings are open to the public, but that there may be portions of the hearing
24 that are not disclosed to the public such as the physical identity of an undercover police officer.
25 (Appellants' Ex. 11.) That afternoon, Santiago sent Lawrence Appellants' brief and reminded
26 Lawrence to review the DPH brief about whether the undercover police officer could provide virtual
27 testimony, an evidentiary issue Appellants were apprised of on November 7. (*Id.*; Appellants' Ex. 12
28 at p. 2.) On November 13, 2025, Santiago reminded Lawrence that DPH needed a decision on whether

1 the police officer had to physically appear at the hearing; no argument or advice on this request was
2 given. (Appellants' Ex. 11.) Later that day, Lawrence asked Santiago for a copy of Ivy Phan's August
3 12, 2025 email, which Appellants' counsel had correctly asserted revealed the name of the undercover
4 officer in the police report. (*Id.*) This email was provided by Santiago to Lawrence. (*Id.*) Lawrence
5 then asked Santiago how many undercover officers were on staff during a prior decoy operation at
6 Serenity Spa in 2021. (*Id.*) Santiago requested this information from Vega and provided the
7 information to Lawrence that DPH did not know the number of undercover officers but could confirm
8 that the undercover officer in the 2025 operation was not the same officer as in the 2021 operation.
9 (*Id.*)

10 At no time did Santiago ever copy Vega and Phan on his communications to Lawrence. (*Id.*)
11 At no time did Santiago ever copy Lawrence on his communications with Vega and Phan. (*Id.*)
12 According to the California Supreme Court, Santiago, as a non-prosecutor, could have provided *ex*
13 *parte* advice to Hearing Officer Lawrence. But, here, he never provided advice. He provided briefing
14 from both parties, a reminder to review a request for the virtual appearance of an officer, and answered
15 basic factual questions, such as whether the Sergeant Glenn had been the undercover officer in the
16 2021 SFPD operation. (Appellants' Ex. 11.) Appellants cannot prove that these communications were
17 improper. Moreover, Appellants cannot prove that absent these communications, the Hearing Officer
18 would have decided the case in favor of Appellants.

19 **E. There is no evidence that the hearing officer was biased.**

20 Hearing Officer Lawrence was not biased. Unless they have a financial interest in the outcome,
21 adjudicators are presumed to be impartial. (*Morongo Band of Mission Indians v. State Water*
22 *Resources Control Bd.* (2009) 45 Cal.4th 731, 737.) To show nonfinancial bias sufficient to violate
23 due process, a party must demonstrate actual bias or circumstances "in which experience teaches that
24 the probability of actual bias on the part of the judge or decisionmaker is too high to be
25 constitutionally tolerable." (*Id.* [internal cites omitted].) Appellants argue that Hearing Officer
26 Lawrence was not impartial because she (1) engaged in *ex parte* communications; (2) scowled at
27 Appellants' counsel and threatened to expel him from the hearing; and (3) refused to rule on
28

1 Appellant’s evidentiary objections. These arguments are meritless. The *ex parte* allegation is
2 addressed above.

3 Hearing Officer Lawrence had to chastise Appellants’ counsel because of his improper
4 behavior. Appellants’ counsel interrupted DPH at least three times when DPH was presenting its initial
5 case. (Appellants’ Exs 9 and 13 at minute 3:19-4:18, 6:18-6:29, 9:35-10:15.) This followed clear
6 instructions before and at the start of the hearing that each side would have seven minutes to present
7 its initial case. (Callewaert Decl. Ex. 1 at Ex. D, pp. 25-26; Appellants’ Exs. 9 and 13 at minute 1:34.)
8 During the third interruption, Hearing Officer Lawrence had to ask Appellants’ counsel to stop
9 interrupting DPH during DPH’s turn or she would ask him to leave. (Appellants’ Exs 9 and 13 at
10 minute 9:35-10:15.) Hearing Officer Lawrence did her best to maintain the Director’s Hearing
11 procedure despite these interruptions, acts that demonstrate her commitment to impartially following
12 the hearing procedure.

13 Despite Appellants’ claims to the contrary, Hearing Director Lawrence *did* consider
14 Appellants’ evidentiary objections (Appellants’ Ex. 12) and decided to allow DPH to continue to
15 present its evidence. (Appellants’ Exs. 9 and 13 a minute 3:19-4:18.) A director’s hearing is not
16 superior court. The rules of evidence don’t apply, and the Hearing Director reminded Appellants of
17 this. (Gov. Code, § 11513(c); Callewaert Decl. Ex. 1 at Ex. D, pp. 25-26; Appellants’ Exs. 9 and 13 at
18 minute 1:57-2:04.) Appellants here are essentially arguing that the Hearing Officer showed bias by
19 exercising her discretion appropriately.

20 **F. Appellants were allowed more than their allotted time to present their defense.**

21 Despite their claims, Appellants were informed in advance of the time limits and procedure for
22 presenting their case at the hearing. DPH served the Director Hearing Request Form on Appellants.
23 (Callewaert Decl. Ex. 1 at Ex. E, pp. 30-32.) The form specifies the hearing procedures, including
24 stating that each side will have seven minutes to present relevant testimony, evidence, and
25 recommendations and three minutes for rebuttal. (Callewaert Decl. Ex. 1 at Ex. D, pp. 25-26.) It also
26 allows the hearing officer to increase the amount of time given to the parties as circumstances warrant
27 and in the interest of fairness. (*Id.*) This exact procedure was orally repeated by the Hearing Officer at
28 the start of the hearing. (Appellants’ Exs. 9 and 13 at minute 1:34.)

1 Hearing Officer Lawrence allowed Appellants far more than seven minutes for their opening
2 and three minutes for their rebuttal. The hearing lasted slightly under 52 minutes. (Appellants' Exs. 13
3 and 9.) Of these 52 minutes, Appellants had approximately 24.5 minutes to present their case,
4 including cross-examining DPH's witness, and DPH had approximately 18.25 minutes to present its
5 case. (*Id.*) Appellants can hardly claim unfairness for truncated time when the Hearing Officer granted
6 them more than twice their allotted total time and more time than was given to DPH.

7 **G. The recording of the Director's Hearing is adequate.**

8 The recording of the hearing is adequate. In *Frase v. Gourley*, cited by Appellants as the basis
9 to dismiss this matter, the DMV lost entire portions of the transcript of the license suspension hearing,
10 including the entire testimony of the petitioner and his expert, and then refused to pay to help
11 reconstruct the record. (*Frase v. Gourley* (2000) 85 Cal.App.4th 762, 763.) No such egregious facts
12 exist here. DPH agreed to record the hearing by audio. (Callewaert Decl. Ex. 1 at Ex. D, p. 26.) There
13 was no representation or requirement that DPH would capture video of every person speaking. (*Id.*) A
14 municipal health agency is not required to perform as a professional videographer. There was no
15 representation that DPH would provide a transcript of the hearing. (*Id.*) While some words are difficult
16 to understand in the hearing video, it is still a comprehensive recording of the hearing as evidenced by
17 Appellants' detailed complaints about testimony and the Hearing Officer's decisions during the
18 hearing. (Appellants' Ex. 9; Appellants' Brief.) The difficulty in understanding some words is not the
19 same as losing entire portions of the hearing as happened in *Frase*. At the request of Appellants, DPH
20 also provided a transcript of the hearing that admittedly has many transcription errors but also provides
21 a helpful guidepost of the timing of testimony in the video. (Appellants' Ex. 13.) The court in *Frase*
22 stated that the DMV had many choices if it did not maintain an adequate record for judicial review,
23 including reconstructing the record or preparing a summary of the facts. (*Frase*, 85 Cal.App.4th at
24 765.) Here, the video recording is for the most part comprehensible, and DPH supplemented the
25 recording with a rough transcript. The instant case is not comparable to the issues in *Frase*.

26 **H. The Hearing Officer did state the reason for her determination.**

27 An agency should provide private parties with a written decision stating the reasons for the
28 determination and indicating the evidence relied on, although the statement need not amount to a full

1 opinion or even formal findings of fact and conclusions of law. (*Goldberg v. Kelly* (1970) 397 U.S.
2 254, 270.) The Director’s Hearing Order complies with these requirements. It states that the San
3 Francisco Health Code violations at issue are “lewd conduct” and “practitioner conduct,” that the
4 Hearing Officer considered the “evidence and testimony received at the hearing,” and that “the
5 findings stated in the Inspection Report(s) are true.” (Appellants’ Ex. 1 at p. 1.) The DPH Inspection
6 Report clearly details the facts relating to lewd conduct by a massage practitioner and solicitation of
7 the undercover police officer. (Callewaert Decl. Ex. 1 at Ex. C, pp. 17-20.) The Order then revokes
8 Appellants’ massage establishment permit and orders penalties for lewd conduct.

9 **I. Appellants’ allegations about police conduct are unsupported by facts or law.**

10 Appellants make sweeping allegations about police misconduct in this case that are
11 unsupported by fact or law. Appellants state that they intend to brief this issue in full in the superior
12 court, but they do not make such arguments to this Board of Appeals. (Appellants’ Brief at p. 11.)
13 Appellants appear to argue that the procedure for police undercover operations should be different, but
14 that does not bear on the only relevant issue before this Board, that Appellants’ masseuse engaged in
15 lewd conduct and solicitation in violation of the San Francisco Health Code.

16 **CONCLUSION**

17 The Board of Appeals should uphold the December 19, 2025 DPH Director’s Hearing Order.

18 Dated: March 18, 2026

19 DAVID CHIU
20 City Attorney
21 ANNE PEARSON
22 Chief Attorney
23 Health Team
24 MEGAN RYAN
25 Deputy City Attorney

26 By: /s/ Megan Ryan
27 MEGAN RYAN

28 Attorneys for Respondent
CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC HEALTH

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CITY AND COUNTY OF SAN FRANCISCO
9 DEPARTMENT OF PUBLIC HEALTH

10 SAN FRANCISCO BOARD OF APPEALS

11 JING HUANG and LIYAN WANG, DBA
12 RICHMOND SERENITY SPA

13 Appellants,

14 vs.

15 CITY AND COUNTY OF SAN FRANCISCO
16 DEPARTMENT OF PUBLIC HEALTH,

17 Respondent.

Appeal No. 25-059

DECLARATION OF JENNIFER CALLEWAERT
IN SUPPORT OF RESPONDENT’S OPPOSITION
TO APPELLANTS’ BRIEF REQUESTING THAT
THE BOARD REVERSE DPH’S DECISION TO
REVOKE THE SPA’S MASSAGE LICENSE AND
DISMISS THE ACTION WITH PREJUDICE

18
19
20 I, JENNIFER CALLEWAERT, declare as follows:

21 1. I am the Acting Director of the Environmental Health Branch of the San Francisco
22 Department of Public Health (“DPH”). I make this declaration in support of Respondent’s Opposition
23 to Appellants’ request that the Board of Appeals reverse the December 19, 2025 DPH Director’s
24 Hearing Order. I attach several records to supplement the evidence submitted by Appellants with their
25 brief.

EXHIBIT 1



Environmental Health Basis for Proposed Enforcement Action Summary

DATE: November 13, 2025
 TO: SF DPH Director c/o Hearing Officer
 THRU (Signature Required): Michelle Vega
 RESPONSIBLE PARTY(IES): Business Owners:
Li Yan Wang & Jing Huang
 DBA Richmond Serenity Spa
 ADDRESS 3446 Balboa St
 HEARING DATE: November 20, 2025
 CASE NUMBER: MSG-25-03

Purpose of Hearing: (include proposed enforcement action):	1. Find that a violation of San Francisco Health Code (SFHC) Article 29 – Licensing and Regulation of Massage Practitioners and Massage Businesses, section 29.17(b) Lewd Conduct Prohibited; section 29.31(f) Practitioner Conduct; section 29.33(a)(3) Grounds for Suspension or Revocation ; and 2. Pay Administrative fines and permit penalty, Article 29.45(a)(3) and (a)(12)
--	---

ENFORCEMENT AUTHORITY AND BASIS OF PENALTY

(Environmental Health based the enforcement action and penalty on the following code(s):)

CODE SECTION	DESCRIPTION
SF Health Code, Article 29, Section 29.33(a)(3)	Grounds for Suspension or Revocation. The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds: (3) The permittee or the permittee’s agent, employee, or independent contractors has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this Article 29, any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business.
SF Health Code, Article 29, Section 29.45(a)	Any person who violates any provision of this Article 29 or any rule or regulation adopted pursuant to Section 29.2 may, after being provided notice and an opportunity to be heard, be subject to the following monetary and permit penalties. The Director may impose administrative fines and/or permit penalties that exceed those listed in this Section 29.45 where the Director finds that such higher fines and/or penalties are necessary or appropriate to protect and promote the health and well-being of a Massage Business’ employees, customers, and/or neighbors.
SF Health Code, Article 29, Section 29.45(a)(3)	Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as Defined by California Penal Code Section 647(a) or (b) and/or San Francisco Police Code Section 225, for Anyone Working at Massage Establishment. (A) Administrative fine: \$5,000 to be paid by Massage Establishment permittee
SF Health Code, Article 29, Section 29.45(a)(12)	Anyone Engaged In Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises. (A) Administrative fine: \$2,500 to be paid by Massage Business permittee, and (B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit. Permit holder ineligible for subsequent Massage Practitioner or Massage Business Permit for a period of five years from the date of permit revocation.
SF Health Code, Article 29, Section 29.31(f)	Practitioner Conduct. Massage Establishments shall be responsible for the conduct of all individuals providing

	Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.
SF Health Code, Article 29, Section 29.2	This Article 29 shall be administered and enforced by the Department of Public Health. The Director may adopt rules and regulations to carry out the provisions of this Article.
SF Health Code, Article 29, Section 29.32	INSPECTION. Any member of the Department may inspect any Massage Establishment or Sole Practitioner Massage Establishment to determine whether the Establishment is operating in compliance with the provisions of State law or this Article 29 , or for the purpose of providing educational materials to employees of the Establishment in culturally and linguistically appropriate languages regarding the City and County of San Francisco Sanctuary City policy, employee rights, and information on a variety of resources, including linkage to health care services, victim services, and emergency numbers and hotlines to call for information and assistance. Nothing in this Section shall be construed to limit or restrict the lawful authority of a police officer or other City employee to enter premises licensed under this Article 29.
SF Health Code, Article 29, Section 29.43(a)	If the Director determines that a Massage Practitioner or Massage Business is operating in violation of this Article 29 (which is deemed in the entirety of this Section 29.43 to include a violation of a permit condition and/or a violation of the rules and regulations adopted pursuant to this Article), the Director may issue a Notice of Violation to the Massage Practitioner, the Massage Business, the owner of real property where the violation occurred, and/or any other Persons the Director deems responsible for causing the violation. The issuance of the Notice of Violation may be by hand delivery, registered mail, or electronic mail.
SF Health Code, Article 29, Section 29.43(b)	The Notice of Violation shall include the following information: (1) That the Director has made a determination that the Massage Practitioner or Massage Business has operated in violation of this Article 29 ; (2) The alleged acts or failures to act that constitute the basis for the Director's determination; (3) That the Director intends to take enforcement action against the Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s), and the nature of that action, including the administrative penalty and enforcement costs to be imposed, and/or the suspension or revocation of the Massage Practitioner and/or Massage Establishment permit(s); (4) That the Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has the right to request a hearing before the Director within 15 days after the Notice of Violation is issued, which request must be made in writing.
SF Health Code, Article 29, Section 29.43(d)	Upon a timely request for a hearing, the Director shall, within 15 days of the request, notify the requester of the date, time, and place of the hearing. Such notification may be made by hand delivery, registered mail, or electronic mail. The Director shall make available to the requester the photographs and other recorded evidence obtained in support of the Notice of Violation as well as a copy of the report prepared by the Director's designee, if any, to support the Notice of Violation. Such hearing shall be held no later than 60 days after the Director receives the request, unless time is extended by mutual agreement of the requester and the Director.
SF Health Code, Article 29, Section 29.43(e)	The Director shall conduct the hearing, or a hearing officer may be designated, who shall have the same authority as the Director to hear and decide the case and make any orders consistent with this Article 29 . The Massage Practitioner, Massage Business, owner of real property, or other Person(s) deemed responsible for causing the violation(s) may present evidence for consideration, subject to any rules adopted by the Director or hearing officer for the orderly conduct of the hearing. Within 60 days of the conclusion of the hearing, the Director or hearing officer shall render a decision in the form of a written order, which the Director shall promptly serve on the Massage Practitioner, Massage Business, owner of real property, or any other Persons charged in the Notice of Violation. Service of the written order may be made by hand delivery, registered mail, or electronic mail. The order shall state whether the Notice of Violation has been upheld (in whole or in part), and the enforcement action taken against each party.
SF Health Code, Article 29, Section 29.43(f)	If the order directs the Massage Practitioner, Massage Business, owner of real property, or other person to pay an administrative penalty and/or enforcement costs, such amount shall

	be paid within fifteen days from the mailing of the order; the order shall inform the recipient of such deadline for payment.
SF Health Code, Article 29, Section 29.43(g)	If the order suspends or revokes a permit, the permittee must cease operations within 24 hours of the suspension or revocation order being final.
SF Health Code, Article 29, Section 29.43(h)	If the order suspends or revokes a permit, or imposes additional permit conditions, it may be appealed to the Board of Appeals in the manner prescribed in Article 1 of the Business and Tax Regulations Code; the order shall inform the recipient of such right to appeal.

RESPONSIBLE PARTY or PERSON IN CONTROL OF PROPERTY/UNIT/BUSINESS

(List the code sections that allows EH to take enforcement action against the Persons named in enforcement documents:)

CODE SECTION	DESCRIPTION
SF Health Code, Article 29, Section 29.2	Administration and Enforcement - This Article 29 shall be administered and enforced by the Department of Public Health. The Director may adopt rules and regulations to carry out the provisions of this Article.
SF Health Code, Article 29, Section 29.5	<p>“Compensation” means a payment, loan, advance, donation, contribution, deposit, forgiveness of debt, or gift of money or anything of value.</p> <p>“Department” means Department of Public Health.</p> <p>“Director” means the Director of the Department of Public Health or any individual designated by the Director to act on his or her behalf.</p> <p>“Inspector” means a Department employee responsible for conducting inspections on behalf of the Department.</p> <p>“Massage” means any method of pressure on or friction against, or stroking, kneading, rubbing, tapping, pounding, vibrating, or stimulating the external soft pads of the body with the hands or with the aid of any apparatus or appliance.</p> <p>“Massage Establishment” means a fixed place of business where more than one individual administers Massage for Compensation, excluding those locations where Massage is provided only on an outcall basis.</p> <p>“Massage Practitioner” means any individual who administers Massage for Compensation pursuant to a permit issued by the Director under this Article 29.</p> <p>“Owner” means any individual, partnership, firm, association, corporation, or combination of individuals of whatever form or character with an ownership interest in a business that provides Massage services.</p>

CODE VIOLATIONS *(Provide the outstanding code violations or the violations that requires the hearing:)*

CODE SECTION	DESCRIPTION	VIOLATION DATE(S)
SF Health Code, Article 29, Section 29.17(b)	Lewd Conduct and Prostitution Prohibited. Consistent with California Penal Code Section 647, as may be amended, and San Francisco Police Code Section 225, as may be amended, Massage practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.	SFPD: 6/17/2025
SF Health Code, Article 29, Section 29.31(f)	Practitioner Conduct. Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.	SFPD: 6/17/2025



PROPOSED ENFORCEMENT ACTION (For consideration to be included in Director's decision letter and/or Order:)

Environmental Health proposes that following enforcement action is taken against the Responsible Party:

1. Immediately discontinue allowing lewd conduct at the Establishment.
2. Massage Establishment Permit #ME-120465 shall be revoked. No new massage permit shall be issued at this location within 5 years from the date of permit revocation.
3. Pay the administrative penalty of \$7,500 for the above violations within 15 days of mailing out the signed order.

Based on the health code, the Director (or Hearing Officer) must include the following language in the decision letter and/or Order:

NUISANCE ABATEMENT (Must be included in Director's decision letter):

- Failure to abate and remove the nuisance may result in the abatement of the nuisance by the Department of Public Health and the Property Owner shall become indebted to the City and County of San Francisco for the costs, charges, and fees incurred by reason of the abatement and removal of such nuisance upon demand.

COST RECOVERY (Must be included in Director's decision letter):

- In accordance with the San Francisco Health Code, the Property Owner shall be indebted to the City and County of San Francisco for costs incurred in abating the effects of the violation, taking other remedial action, or imposing and collecting penalties, including but not limited to administrative costs, costs of issuing an order, inspection or monitoring costs, hearing officer costs, and reasonable attorney fees if sought by the Director in the Notice of Hearing. In any proceedings in which the Director seeks to recover attorney's fees, the prevailing party shall be entitled to reasonable attorney's fees. Failure to pay such costs, charges, and fees may result in a lien against the property.

APPEAL PROCESS (Must be included in Director's decision letter):

- Within 15 days of receipt of this letter, you have the right to appeal this decision to deny, suspend, revoke your permit to the Board of Appeals. The Board of Appeals can be contacted at 49 South Van Ness, Suite 1475, San Francisco, CA, telephone number (628) 652-1150 or email boardofappeals@sfgov.org.
- This Order is final and you may have the right to petition the Superior Court of San Francisco for judicial review or appropriate relief pursuant to Section 1094.6 of the California Code of Civil Procedures. The filing of a petition with the Superior Court shall not automatically stay the effectiveness of this Order or extend the time period in which you have to abate the violation.

SFDPH CONTACT (Must be included in Director's decision letter):

- If you have questions or concerns, you may contact Danny Lee at (415) 252-3826.

Sincerely,

Michelle Vega

Michelle Vega
Principal Health Inspector
Massage Program
San Francisco Department of Public Health - Environmental Health Branch

Cc: Paul Horcher, Attorney at Law
Kelly Wong, Principal Planner – SF Planning Department Code Enforcement
Bess Hanish, Deputy City Attorney



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Director's Hearing Case Chronology

Location Address 3446 Balboa St SF, CA 94121	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa	Date of Submittal 11/13/25
Property Owner Jing Huang	Phone (415) 702-6468	Email richmondserenityspa@gmail.com	
Responsible Party or Parties Liyan Wang/Jing Huang	Phone (415) 702-6468	Email richmondserenityspa@gmail.com	

On the Hearing Date, Environmental Health shall present this chronology to the Director's Hearing Officer for the Department of Public Health – Population Health Division as evidence of violation of the specified code(s).	Hearing Date 11/20/25	Program Code MSG	Case Number 25-03
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DATE	CODE SECTION	SUMMARY OF ACTIONS, OBSERVATIONS OR NOTES	EXHIBITS
2024-01-08		San Francisco Department of Public Health (SFPDH) issued massage establishment permit #ME120465.	- Interim Permit - SFPDH Permit #ME120465 - Picture of the exterior of 3446-3448 Balboa St Exhibit A, Page 10-12
2025-06-24		Received redacted copy of the San Francisco Police Department (SFPD) Incident Report #250-337-568 dated 6/17/2025.	SFPD Incident Report dated 6/17/25 Exhibit B, Page 13-16

If checked, chronology continues on supplemental pages.

Based on the facts summarized in this chronology, it is recommended by the undersigned that the Hearing Officer issue the following order:

See proposed enforcement action plan on page 4 of the Environment Health Basis.

Inspector Ivy Phan	Inspector, Signature <i>Ivy Phan</i>
Inspector Email ivy.phan@sfdph.org	Inspector Phone (415) 252-3986
Manager Michelle Vega	Manager Signature <i>Michelle Vega</i>



Director's Hearing Case Chronology
Supplemental Page 2 of 5

Location Address 3446 Balboa St SF, CA 94121	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa	Date of Submittal 11/13/25
Following is a continuation chronology of events presented at this hearing date:			Hearing Date 11/20/25
			Program Code MSG
			Case Number 25-03

DATE	CODE SECTION	SUMMARY OF ACTIONS, OBSERVATIONS OR NOTES	EXHIBITS
	SFHC Sec 29.17(b) and 29.31(f)	Notice of Violation (NOV) issued to Establishment Owners for findings per SFPD incident report #250-337-568.	Inspection Report dated 7/16/25 Exhibit C, Page 17-20
2025-07-16			
		Notice of Determination (NOD), Director's Hearing (DH) Request Form, and DH Guidelines hand-delivered to and reviewed with business owner (BO), Li Yan Wang. Documents were also mailed to BO.	- NOD dated 7/21/25 - DH Request Form - DH Guidelines - Site Visit Report dated 7/23/25
		Proof of Service (POS) was completed.	Exhibit D, Page 21-29
2025-07-23		Per USPS, documents were received & signed for on 7/28/2025.	- POS to BO dated 7/23/25 - Signed Certified Mail Slip & USPS Tracking Exhibit E, Page 30-32
		Signed DH Request Form received by DPH via email from BO.	Signed DH Request Form Exhibit F, Page 33
2025-08-06			



Director's Hearing Case Chronology
Supplemental Page 3 of 5

Location Address 3446 Balboa St SF, CA 94121	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa	Date of Submittal 11/13/25
Following is a continuation chronology of events presented at this hearing date:			Hearing Date 11/20/25
			Program Code MSG
			Case Number 25-03

DATE	CODE SECTION	SUMMARY OF ACTIONS, OBSERVATIONS OR NOTES	EXHIBITS
2025-08-20		<p>Emailed out Notice of Hearing (NOH) to BO and counsel.</p> <p>Mailed out NOH to BO's mailing address via certified mail.</p> <p>POS were completed.</p> <p>Per USPS, document was received on 8/22/2025.</p>	<p>- NOH dated 8/20/25</p> <p>- POS to BO dated 8/20/25</p> <p>- Certified Mail Slip & USPS Tracking</p> <p>Exhibit G, Page 34-37</p>
2025-08-25	SFHC Sec 29.17(b) and 29.31(f)	<p>Emailed out Amended NOD #1 to BO and counsel.</p> <p>Mailed out Amended NOD #1 to BO and PO via certified mail.</p> <p>POS were completed.</p> <p>Per USPS, document was received on the following dates: - BO: received & signed 8/27/2025 - PO: received & signed 8/27/2025</p> <p>In response to amended NOD #1, BO's counsel requested a continuance.</p>	<p>- Amended NOD dated 8/25/25</p> <p>- POS to BO dated 8/25/25</p> <p>- Certified Mail Slip & USPS Tracking</p> <p>Exhibit H, Page 38-42</p> <p>- Email correspondence with BO & counsel dated 8/25/25</p> <p>Exhibit J, Page 50-51</p>
2025-08-27	SFHC Sec 29.17(b) and 29.31(f)	<p>Emailed out Amended NOD #2 to BO and counsel.</p> <p>Mailed out Amended NOD #2 to BO and PO via certified mail.</p> <p>POS were completed.</p> <p>Per USPS, document was: - BO: received & signed 8/29/2025 - PO: unclaimed, returning to sender as of 9/18/2025</p> <p>SFDPH granted the continuance requested on 8/25/2025.</p>	<p>- Amended NOD dated 8/27/25</p> <p>- POS to BO dated 8/27/25</p> <p>- Certified Mail Receipt & Tracking Slips</p> <p>Exhibit I, Page 43-47</p> <p>- Email correspondence with BO's counsel dated 8/27/25</p> <p>Exhibit J, Page 49</p>



Director's Hearing Case Chronology
Supplemental Page 4 of 5

Location Address 3446 Balboa St SF, CA 94121	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa	Date of Submittal 11/13/25
Following is a continuation chronology of events presented at this hearing date:			Hearing Date 11/20/25
			Program Code MSG
			Case Number 25-03

DATE	CODE SECTION	SUMMARY OF ACTIONS, OBSERVATIONS OR NOTES	EXHIBITS
2025-09-16		<p>Emailed out NOH to BO and counsel. Counsel confirmed receipt.</p> <p>Mailed out NOH to BO's mailing address.</p> <p>POS was completed.</p>	<p>- Email correspondence with BO's counsel dated 9/16/25 Exhibit J, Page 48-49</p> <p>- NOH dated 9/16/25</p> <p>- POS to BO dated 9/16/25 Exhibit K, Page 53-54</p>
2025-10-14	SFHC Sec 29.17(b) and 29.31(f)	<p>BO's counsel requested continuance on the grounds of an administrative oversight. Continuance was requested via email.</p> <p>SFDPH granted the continuance and provided emailed Amended NOD #3 to BO and counsel.</p> <p>Counsel acknowledged receipt and confirmed continuance.</p> <p>POS was completed.</p>	<p>- Email correspondence with BO's counsel dated 10/14/25 Exhibit L, Page 56-58</p> <p>- Courtesy Notice from BO's counsel dated 10/14/25 Exhibit M, Page 59</p> <p>- Amended NOD dated 10/14/25 Exhibit N, Page 60-61</p> <p>- POS to BO dated 10/14/25 Exhibit O, Page 62</p>
2025-10-28		<p>Emailed out NOH to BO and counsel.</p> <p>Mailed out NOH to BO's mailing address.</p> <p>POS was completed.</p>	<p>- NOH dated 10/28/25</p> <p>- POS to BO dated 10/28/25 Exhibit P, Page 63-64</p>



Director's Hearing Case Chronology
Supplemental Page 5 of 5

Location Address 3446 Balboa St SF, CA 94121	Block/Lot 1578/041	Facility Name (DBA) Richmond Serenity Spa	Date of Submittal 11/13/25
Following is a continuation chronology of events presented at this hearing date:		Hearing Date 11/20/25	Program Code MSG
		Case Number 25-03	

DATE	CODE SECTION	SUMMARY OF ACTIONS, OBSERVATIONS OR NOTES	EXHIBITS
		BO's counsel confirmed availability for 11/20/2025 hearing.	- Email correspondence with BO's counsel dated 10/29/25 Exhibit L, Page 55
2025-10-29			
		Briefing packet to determine if Officer Glenn can virtually testify to avoid compromising his identity was submitted to the Hearing Coordination team - Douglas Obana and Eurich Santiago.	- Email correspondence between SFDPH staff - Briefing Packet Exhibit Q, Page 65-70
2025-11-06			
		Signed declaration received by DPH via email from SFPD Sergeant Glenn.	- SFPD Declaration, Exhibit R, Page 71-75
2025-11-10			



Inspection Report

Facility Address: 3446 Balboa Street	Inspection Date: 1/8/2024
Business Name: Richmond Serenity Spa	Reinspection Date:
Owner Name(s): Liyan Wang & Jing Huang	Inspection Type: New (GENERAL)
Class or Type: General Massage Permit (H67) Phone: (415) 702-6468	Location ID: 120465

GENERAL MESSAGE ESTABLISHMENT PERMIT

Your application for a Health Permit to Operate a GENERAL MESSAGE ESTABLISHMENT is approved on 1/8/2024. Written approval from the San Francisco Zoning Department has been received by the Health Department – Recommend approval: establishment of Personal Service (under general Retail Sales and Service Uses umbrella) and Massage use principally permitted on the ground floor in the Outer Balboa Street NCD per BPA#202305177989. Subject to the controls of 202.2(a).

Post the following in public view:

- Permit to Operate (PTO)
- Anti-Human Trafficking Poster
- License certificate

General Massage Establishment applicant qualified for the “First Year Free” program to support and revive San Francisco small businesses as the City recovers from the pandemic. License fee for this fiscal year 3/31/2024 will be waived. Fiscal year begins April 1, 2023-March 31, 2024. License fee will no longer be waived for FY 2024-2025.

Ensure to pay annual license fee from Tax Collector’s Office.

REMINDERS:

- No massage business shall operate or provide massage service during the hours between 10:00pm and 7:00am
- All massage practitioners performing massage service(s) shall have an SF massage permit or CAMTC certificate
- No alcohol and drugs permitted inside the establishment
- Establishment shall not be used for residential purposes
- Exterior and Interior doors shall remain UNLOCKED during business hours
- **Ensure proper attire and conduct of massage practitioners**
- Establishment must be free from vermin and maintained in sanitary condition
- Ensure and always maintain transparent storefront windows and doors (between 4 feet and 8 feet) to allow visibility to the inside of the building

Inspector: Ivy Phan	Inspector Signature: <i>Ivy Phan</i>
Phone: (415) 252-3986	Received By: <i>[Signature]</i>



PERMIT TO OPERATE

AND CERTIFICATE OF SANITARY INSPECTION

Issued according to provisions of the San Francisco Health Code

ME 120465

AUTHORIZING conduct of the following class of

ISSUED: 1/8/2024

MESSAGE ESTABLISHMENT

Type of Operation: Message - General

Tax Code: H67

CERT No. : 1011533

Name and Address Below:

Owner:	Wang Li Yan / Huang Jing
DBA:	Richmond Serenity Spa
Street Address:	3446 Balboa Street San Francisco, CA 94121

Recommend approval: establishment of Personal Service (under general Retail Sales and Service Uses umbrella) and Massage use principally permitted on the ground floor in the Outer Balboa Street NCD per BPA #202305177989. Subject to the controls of 202.2(a).

DEPARTMENT OF PUBLIC HEALTH

Environmental Health Branch
City and County of San Francisco

Valid only when accompanied by a receipt from the Tax Collector showing payment of current license fee. THIS PERMIT TO OPERATE MAY BE REVOKED OR SUSPENDED FOR CAUSE AND IS NOT TRANSFERABLE. CHANGE OF OWNERSHIP must be reported immediately.

Must comply with all zoning requirements and restrictions

Director of Environmental Health

Display this Permit prominently. This margin may be trimmed for standard 6 x 8 frame.



San Francisco Police Department INCIDENT REPORT

Report Type: **Initial**

250337568

INCIDENT	Incident Number 250-337-568		Occurrence From Date / Time 06/17/2025 16:00		Occurrence To Date / Time 06/17/2025 16:30		Reported Date / Time 06/17/2025 16:30		CAD Number 251682621			
	Type of Incident HOUSE OF PROSTITUTION, KEEPING OR RESIDING IN 13010 SOLICITS FOR ACT OF PROSTITUTION 13060										Retail Theft? <input type="checkbox"/>	
	Location of Occurrence: 3448 BALBOA ST				At Intersection with/Premise Type MISC. BUILDING OR STORE				District RICHMOND			
	Confidential Report? <input checked="" type="checkbox"/>	Arrest Made? <input type="checkbox"/>	Suspect Known? <input type="checkbox"/>	Suspect Unknown? <input checked="" type="checkbox"/>	Non-Suspect Incident? <input type="checkbox"/>	Domestic Violence? <input type="checkbox"/>	(Type of Weapon Used)		Use of Force? <input type="checkbox"/>	Reporting Unit 5W135		
	Location Sent / On View: 3448 BALBOA ST				At Intersection with				Reporting District RICHMOND			
Crime and Clearance Status 0	Reported to Bureau SVUHT	Name Glenn, Robert M	Star 2283	Date/ Time 06/17/2025 16:30	Elder Victim? <input type="checkbox"/>	Gang Related? <input type="checkbox"/>	Juvenile Subject? <input type="checkbox"/>	Prejudice Based? <input type="checkbox"/>				
Have you reviewed the attached list of procedures required by Department General Order (DGO) 7.04?												

250337568

OFFICIAL CERTIFICATION	I declare under penalty of perjury, this report of <u>4</u> pages is true and correct, based on my personal knowledge, or is based on information and belief following an investigation of the events and parties involved. PROP 115 CERTIFIED 5 Year/Post										
	Reporting Officer GLENN, ROBERT M	Star 2283	Station SVU - Human Trafficking	Watch 1	Date 06/17/25 18:57						
	Reviewing Officer FLORES, ANTONIO L	Star 683	Station SVU - Human Trafficking	Watch 1	Date 06/17/25 19:30						
	OIC FLORES, ANTONIO L	Star 683	Station SVU - Human Trafficking	Watch 1	Date 06/17/25 19:30						
	Related Case --	Related Case --	Re-assigned to Copies to 5T300B	Assigned to Add'l Copies	5T300B				Assigned by RG 2283		

REPORTEE	Code R 1	Name (Last, First Middle) SFPD , #2283				Alias				Email			
	Day Phone (415) 553-1735	Type Work	Home Address				City		State	Zip Code			
	Night Phone (415) 930-1720	Type Cell	Work Address 850 BRYANT STREET				City SAN FRANCISCO		State CA	Zip Code 94103-			
	DOB / Age	DOB Unk. <input type="checkbox"/>	or age between and	Race	Sex	Height	Weight	Hair Color	Eye Color	ID Type Jurisd. ID No.			
	Confidential Person <input type="checkbox"/>	Violent Crime Notification <input type="checkbox"/>	293 PC Notification <input type="checkbox"/>	Star			Follow-up Form YES <input type="checkbox"/>	Statement YES <input type="checkbox"/>	Relationship to Subject				
	School (if Juvenile)		Injury/Treatment				Other Information/If Interpreter Needed Specify Language						
	Interpreter Needed <input type="checkbox"/>	Language	Language Description(if Other)			Language Line Service/Interpreter ID#		Bilingual Ofc Star#					

San Francisco Police Department
INCIDENT REPORT

Report Type: **Initial**

250337568

S U S P E C T	Code S 1	Name (Last, First Middle) UNKNOWN, UNKNOWN				Alias				Email										
	Day Phone		Type		Home Address				City				State		Zip Code					
	Night Phone		Type		Work Address 3448 BALBOA ST				City SAN FRANCISCO				State CA		Zip Code 94121-					
	DOB Unknown <input checked="" type="checkbox"/>		Date of Birth		Age		or age between 45 and 55		Race A		Sex F		Height 5'2		Weight 130		Hair Color BLK		Eye Color BRO	
	SFNO		J/D# (if Juvi)		ID Type/Jurisdiction/Number				ID Type/Jurisdiction/Number				ID Type/Jurisdiction/Number							
	Booking Charge(s)								Booking Location											
	Warrant #		Court#		Action#		Dept#		Enroute to											
	Warrant Violation(s)												Bail (\$)							
	Citation#		Violation(s)				Appear Date/time				Location of Appearance									
	<input type="checkbox"/> CA Form Booked Copy Attached		Mirandized: Star <input type="checkbox"/>		Date		Time		CWB Check		Star									
	Book/Cite Approval		Star		Mass Arrest Code		M X-Rays <input type="checkbox"/>		School (if Juvenile)				Statement <input type="checkbox"/>							
	Other Information: Citation/Warrant/Booking Charge(s)/Missing Person-Subject Description; Scars, Marks, Tattoos BLACK SWEATER, BLACK PANTS																			
	Interpreter Needed <input type="checkbox"/>		Language		Language Description(if Other)				Language Line Service/Interpreter ID#				Bilingual Ofc Star#							

NARRATIVE

On the above date and time, I was tasked to conduct undercover operations at 3448 Balboa Street, Richmond Serenity Spa, the goal of this operation was to see if there was illegal prostitution taking place.

A/LT. Flores held a briefing at SVU. Officer Stucki #2471 and Sgt. Lyons #2438 also attended the briefing. The phrase "This is exciting." Was the sign to the units that the there had been an act of prostitution had been solicited. A/Lt Flores provided me with \$200 ((2) hundred dollar bills in Marked City Funds. I photographed the money before the operation.

I was dropped off by Officer Stucki in the area of 3448 Balboa Street. I utilized [REDACTED]. I was wearing a Tan sweatshirt, black T-shirt, grey pants, and black and white shoes.

I went to the door and it was unlocked. I walked inside and was met by (S1) Asian Female who directed me to follow her to a room. I saw that there was a room marked #6 on the left hand side, a laundry room and then the room that I was directed to. (S1) asked How long? I said half hour and she told me that it would cost \$50. I paid with (1) hundred dollar bill and was told that they would bring me my change.

I did not see any other people in the building as I walked back. I could hear voices coming from the other rooms both male and female.

(S1) is describes as an Asian Female, approximately 50 years old, black sweater, black pants. (S1) was approximately 5'2" tall and slender build.

(S1) pointed to the table. I asked (S1) if I was supposed to get naked. (S1) stated to take off and pointed to the nearby chair. I took this to mean that I was to undress and place my clothing on the chair.

The room is described as an inward opening door. There was a massage table in the center of the room. The lights were dim. There was a chair in the left corner opposite the door. A small side table between the chair and the door. In the far right comer was a taller table with lotions and a roll of toilet paper.

I undressed and got under the blanket. (S1) returned and placed (2) Twenty dollar bills and one ten dollar bill on the table. (S1) removed the blanket and I was now laying on the massage table face down, nude.

(S1) rubbed my shoulders, legs, and buttocks. (S1) tried to rub my perineum area. I tried to prevent that butt clinching my buttocks cheeks.

(S1) asked if I wanted to turn over. (S1) toweled me off with a warm towel. (S1) grabbed blanket that was near my feet and moved it off of the bed. (S1) massaged my chest and stomach. (S1) grabbed my penis with her left hand. (S1) asked "you want?" (S1) made an up and down motion with her hand in the air while making a hollow fist. (Fingers open making a circle) I know based on my training and experience that (S1) was asking if I wanted to her to manually stimulate me (Hand Job).

I asked (S1) how much and she stated "you tell me." I offered 60 dollars and she stated yes. (S1) went over to the corner shelf area and got oil. (S1) grabbed my penis now with both hands. I gave the predesignated signal twice. Sgt. Lyons called.

I told (S1) that it was my wife. (S1) stated that she wanted me to lay back down and go "real quick". (S1) offered several times for me to "finish." I told her that I would still give her the money but I had to leave. (S1) handed me a towel to clean my genitals with.

I gave (S1) the \$50 remaining dollars and exited the building.

Report Type: **Initial**

I ended the recordings, I uploaded the photographs to this report as well as the [REDACTED]

I additionally placed the photos and recordings on a Scan disk.

CONFIDENTIAL



SAN FRANCISCO HEALTH CODE ARTICLE 29, OFFICIAL INSPECTION REPORT

Location Address: 3446 BALBOA ST SAN FRANCISCO CA	Time In: 01:30 PM	Inspection Date: 07/16/2025
Business Name: Richmond Serenity Spa	Time Out: 02:10 PM	Re-Inspection Date:
Owner Name:	Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Complaint <input type="checkbox"/> Re-Inspection <input type="checkbox"/> Consultation <input type="checkbox"/> New Ownership <input type="checkbox"/> Change of Ownership	Facility Permit/License: <input checked="" type="checkbox"/> Valid <input type="checkbox"/> Invalid <input checked="" type="checkbox"/> Posted <input type="checkbox"/> Not Posted
Email:		BAN#/Expiration Date: 03/31/2026
Location ID: ME 120465 Phone: (415) 702-6468		

NOTICE OF VIOLATION

Issued to: Establishment Owner Liyan Wang/Jing Huang
 Massage Practitioner _____

Following this Notice of Violation, **the Director** will issue a Notice of Determination that the Massage Practitioner or Massage Business has operated in violation of this Article 29.

See Violations: M7

The Director intends to take enforcement action against the Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s), and the nature of that action, including potential administrative penalty and enforcement costs to be imposed, and/or suspension or revocation of the Massage Practitioner and/or Massage Establishment permit(s).

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has the right to request a hearing before the Director within fifteen (15) days after a Notice of Determination is issued, which request must be made in writing.

Employees Present:	BAN or License Number & Expiration Date	CAMTC	DPH	NOV Issued
Yong Mei Hu	11516 09/19/2026	Yes		
Liyan Wang	19846 04/11/2027	Yes		

Observations:

M7.Practitioner was engaged in lewd conduct
Status: YES
Type: ["Violation"]
Violation Code: SFHC 29.17(b), 29.31(f)-Practitioner was engaged in lewd conduct
Corrective Actions: Massage practitioner shall not engage in lewd conducted on business premises. Massage practitioner shall immediately discontinue engaging in lewd conducted at the massage establishment. The massage establishment owner/operator is responsible for the conduct of all individuals providing massage for compensation at this establishment.
Observations: In reference to the San Francisco Police Department (SFPD) Incident Report #250337568:
 - An unknown practitioner "tried to rub my perineum area. I tried to prevent that by clinching my buttock cheeks".
 - The same unknown practitioner "grabbed my penis with her left hand. [She] asked 'you want?' and made an up and down motion with her hand in the air

Please be advised that inspections by the Department of Public Health staff are not intended to take the place of other regulatory agency inspections. Additional violations of laws and regulations enforced by other agencies may be present.

Ivy Phan (415) 252-3986
 Name and Signature of Inspector/Investigator and Phone Number


Liyan Wang
 Name and Signature of Business Operator/Practitioner

Representative refused to sign. Inspection findings were explained and a copy was left with: _____



SAN FRANCISCO HEALTH CODE ARTICLE 29, NOTICE OF VIOLATION INSPECTION REPORT

Location Address: 3446 BALBOA ST SAN FRANCISCO CA 94121-2702	Business Name: Richmond Serenity Spa	Inspection Date: 07/16/2025 Location ID: ME 120465
Violations: <i>See reverse sides of Page 1 and 2 for code sections and administrative penalties.</i>		
Inspector Observations: <i>The marked violations are Health Code violations which must be corrected by dates indicated. Failure to comply may result in a Notice of Violation.</i>		
Permit <input type="checkbox"/> M1. Operating establishment without a valid permit. <input type="checkbox"/> M2. Permit not posted on site. <input type="checkbox"/> M3. Practicing massage without a valid license. <input type="checkbox"/> M4. Practitioner's license not available. <input type="checkbox"/> M5. Incorrect application information submitted.	cheeks". - The same unknown practitioner "grabbed my penis with her left hand. [She] asked 'you want?' and made an up and down motion with her hand in the air while making a hollow fist (fingers open making a circle). I know based on my training and experience that [she] was asking if I wanted her to manually stimulate me (hand job)." - "I asked [her] how much and she stated 'you tell me'. I offered 60 dollars and she stated yes." - "[She] went over to the corner shelf area and got oil. [She] grabbed my penis now with both hands." undefined	
Conduct <input type="checkbox"/> M6. Practitioner wearing inappropriate attire. <input checked="" type="checkbox"/> M7. Practitioner was engaged in lewd conduct. <input type="checkbox"/> M8. Obstructed or prevented an inspection or threatened and/or touched City staff. <input type="checkbox"/> M9. Employing person under the age of 18. <input type="checkbox"/> M10. Practitioner solicitation charges or conviction. <input type="checkbox"/> M11. Human Trafficking charges or conviction.	.Notes Status: YES Observations: A routine inspection was conducted. Senior Inspector D. Lee present. NOTES - 2 practitioners; 1 customer - 3 treatment rooms (2 singles, 1 couple) - Customer was in session in second treatment room - unable to inspect. - Refrigeration unit in employee break area has a bit of excess food. Advised to remove, but does not rise to the level of a public health concern at this time. - Towel warmer in the laundry room has some essential oil buildup. Advised to consider replacing soon, but does not rise to the level of a public health concern at this time. - Restroom is adequately stocked. - All massage tables are in good, sanitary condition. - Overall sanitation is adequate. - Business Owner, Liyan, was notified of SFPD's buy walk operation on 6/17/2025. Please reach out to SFPD for a copy of the incident report. - SFDPH will be in contact at a later time regarding further enforcement documents. - Liyan Wang refused to sign report without presence of her partner.	
Structural <input type="checkbox"/> M12. Unapproved ceiling/walls in shower room. <input type="checkbox"/> M13. Improper/inadequate plumbing fixtures. <input type="checkbox"/> M14. Toilet room doors open outward. <input type="checkbox"/> M15. Unapproved residential use. <input type="checkbox"/> M16. Human Trafficking information not posted. <input type="checkbox"/> M17. Inadequate ventilation. <input type="checkbox"/> M18. Inadequate lighting. <input type="checkbox"/> M19. Employees lounge inadequate.		
Operational <input type="checkbox"/> M20. Unsanitary conditions, presence of vermin <input type="checkbox"/> M21. Toilet/Tub/Shower rooms not clean. <input type="checkbox"/> M22. Interior and/or exterior doors were locked. Hand Sink <input type="checkbox"/> M23. No hot water, soap, or sanitary towels provided for hand wash station. Linen <input type="checkbox"/> M24. Linen not changed after each use. <input type="checkbox"/> M25. Clean linen not properly stored. Massage Table <input type="checkbox"/> M26. Massage tables are not sanitary. <input type="checkbox"/> M27. Beds are being used for massage. Miscellaneous <input type="checkbox"/> M28. Operating between 10:00 PM and 7:00 AM. <input type="checkbox"/> M29. Alcohol or illegal drugs present. <input type="checkbox"/> M30. Noncompliance with other City agency codes e.g. nontransparent exterior door and/or window(s). <input type="checkbox"/> M31. Unapproved Advertising. <input type="checkbox"/> M32. Operating a massage school. <input type="checkbox"/> M33. Other.	<hr/> RE-INSPECTIONS: The Massage Business may be charged an hourly re-inspection fee per SFHC Art. 29 §29.41(e) <hr/>	

Ivy Phan  (415) 252-3986
Signature of Inspector/Investigator and Phone Number

Liyan Wang
Signature of Business Operator/Practitioner

	Violation Per SFHC Article 29	Administrative Penalties Per SFHC Article 29	Corrective Action
M1	[SFHC Art. 29 §29.25] You are currently operating a massage establishment without a SFDPH permit. You must cease and desist from operating a massage establishment until you have received a permit.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (1) (A) Administrative fine: Up to \$1,000 per day of operating without a permit; and • SEC. 29.45 (a) (1) (B) Permit penalty: Business location and Owner of Massage Business ineligible for a Massage Business permit for 180 days. • SEC. 29.45 (a) (1) (C) Repeat violations: Same penalties as (a) (1) (A) and (a) (1) (B). 	Immediately submit all application materials, pay applicable fees and obtain a permit prior to operating a massage establishment.
M2	[SFHC Art. 29 §29.31(k)] Every permit to operate a Massage Establishment must be posted in a conspicuous place and readily visible.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (13) (A) Administrative fine: Written warning for first violation, \$250 for second and each subsequent violation within 12 months. • SEC. 29.45 (a) (13) (B) Permit Penalty: 30-day suspension of Massage Business permit for third and subsequent violations. 	Post the Massage Establishment Permit in a location that is readily visible to anyone entering the business.
M3	[SFHC Art. 29 § 29.10, 29.31(e)] One or more of the massage practitioners is currently practicing massage without a SFDPH or CAMTC permit. Massage establishment owners must ensure that all practitioners have a valid license.	<p>Owner:</p> <ul style="list-style-type: none"> • SEC. 29.45 (a) (5) (A) Administrative fine: \$1,000 to be paid by Massage Business permittee. • SEC. 29.45 (a) (5) (B) Permit penalty: None. • SEC. 29.45 (a) (5) (C) Repeat violations: 15-30 day suspension of Massage Business permit and up to \$2,500 fine for second occurrence; 30-60 day suspension or revocation of Massage Business permit and up to \$5,000 fine for third occurrence. <p>Practitioner:</p> <ul style="list-style-type: none"> • SEC. 29.45 (a) (11) (A) Administrative fine: \$500 fine or participation in a Public Health and Safety Program. • SEC. 29.45 (a) (11) (B) Repeat violations: \$1,000 fine for second occurrence; \$1,500 fine for third and each subsequent occurrence and individual ineligible for Massage Practitioner permit for 180 days. 	Immediately discontinue all massage administration for compensation. Submit all application materials, pay applicable fees and obtain a Certificate from CAMTC prior to administering massage for compensation.
M4	[SFHC Art. 29 § 29.15] The massage practitioner must present a valid SFDPH or CAMTC permit card to any health inspector or law enforcement officer upon request. You are not able to provide the requested permit card during the inspection.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (14) (A) Administrative fine: \$250 to be paid by Massage Practitioner or participation in a Public Health and Safety Program. 	Immediately provide a valid SFDPH license certificate or CAMTC ID card and keep the card with you whenever administering massage for compensation.
M5	[SFHC Art. 29 § 29.26] The Massage Establishment Application information submitted was incomplete or incorrect. Application information was missing or incorrect as indicated on the Notice of Violation.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately submit a complete application or required documentation with all forms properly completed.
M6	[SFHC Art. 29 § 29.17(a), 29.31(f)] The massage practitioner's attire is inappropriate and in violation of the SFDPH health code. The Massage Establishment owner is responsible for the conduct of all individuals providing massage for compensation.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (8) (A) Administrative fine: Up to \$ 500 per person found to be improperly attired, to be paid by Massage Business permittee. • SEC. 29.45 (a) (8) (B) Permit penalty: 60 day suspension of Massage Business permit for each person found to be improperly attired. • SEC. 29.45 (a) (8) (C) Repeat violations: Up to \$1,500 fine per person to be paid by Massage Business permittee for second and each subsequent occurrence; 180 -day suspension of Massage Practitioner Permit and revocation of Massage Business permit. 	Immediately discontinue wearing inappropriate attire. Wear clothing that is not transparent, see through or that substantially exposes practitioner's undergarments... breasts, buttocks, or genitals. The massage practitioner shall remain fully clothed while administering massage or when present in the establishment to which the public has access.
M7	[SFHC Art. 29 § 29.17(b), 29.31(f)] The massage practitioner engaged in lewd conduct at the time of the inspection. The Massage Establishment owner is responsible for the conduct of all individuals providing massage for compensation.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (12) (A) Administrative fine: \$ 2,500 to be paid by Massage Business permittee, and • SEC. 29.45 (a) (12) (B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit. • SEC. 29.45 (a) (12) (C) Repeat violations: Revocation; permittee ineligible for a subsequent Massage Practitioner or Massage Business Permit for a period of five years from the date of permit revocation. 	Immediately discontinue engaging in any lewd conduct at the permitted massage establishment.
M8	[SFHC Art. 29 § 29.32, 29.33(a)(2)] The massage owner, operator or practitioner prevented or obstructed the Department from conducting an inspection or threatened and/or touched City Staff.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (16) (A) Administrative fine: \$1,000 fine to be paid by Massage Business permittee. • SEC. 29.45 (a) (16) (B) Repeat Violation \$2,500 fine and 30 day suspension of Massage Business permit for second occurrence; revocation of Massage Business permit for third occurrence. 	Discontinue obstructing or preventing the Department from conducting an inspection or threatening, touching, and/or delaying City Staff from entering the massage establishment.
M9	[SFHC Art. 29 §29.31(d)] The massage establishment has a minor working at the establishment and it is unlawful to employ anyone under the age of 18.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (2) (A) Administrative fine: None. • SEC. 29.45 (a) (2) (B) Permit penalty: Mandatory revocation of Massage Business permit. Massage Business permittee ineligible for a subsequent permit for 180 days. 	Immediately discontinue employing anyone under the age of 18.
M10	[SFHC Art. 29 § 29.29(b)(5)] The massage practitioner or owner/operator was charged or convicted of solicitation or pimping as defined in the California Penal Code § 647(a) or (b) and/or the San Francisco Police Code §225 or, any offense listed in SFHC 29.29(b)(5).	<ul style="list-style-type: none"> • SEC. 29.45 (a) (3) (A) Administrative fine: \$5,000 to be paid by Massage Establishment permittee; and • SEC. 29.45 (a) (3) (B) Permit penalty: Mandatory 60-120 days suspension of Massage Establishment permit. • SEC. 29.45 (a) (3) (C) Repeat violations: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location for a period of two years. 	Immediately discontinue administering massage for compensation or operating a massage business. Working in or operating a massage establishment after having been charged or convicted of solicitation or any offense listed in SFHC 29.29(b)(5) is prohibited and subject to SFHC 29.33(a).
M11	[SFHC Art. 29 § 29.29(b)(5)(E)] The massage practitioner or owner/operator was charged or convicted of human trafficking as defined in the California Penal Code § 236.1.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (4) (A) Administrative fine: None. • SEC. 29.45 (a) (4) (B) Permit penalty: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location. • SEC. 29.45 (a) (4) (C) Repeat violations: Same penalty as (a) (4) (B). 	Immediately discontinue administering massage for compensation or operating a massage business. Working in or owning a massage establishment after having been charged or convicted of human trafficking is prohibited and subject to SFHC 29.33(a).
M12	[SFHC Art. 29 § 29.27(a)(1), 29.31(a)] The shower room ceiling and/or wall are not made of waterproof, hard, nonabsorbent materials which could be easily cleaned.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Discontinue using the shower rooms until proper ceilings and/or walls are installed in accordance with the San Francisco Building Code.
M13	[SFHC Art. 29 § 29.27(a)(2), 29.31(a)] Improper or inadequate plumbing fixtures in toilet rooms or rooms used for tubs, steam, bath, and showers	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Discontinue using the shower rooms until proper plumbing fixtures are installed in accordance with the San Francisco Plumbing Code.
M14	[SFHC Art. 29 § 29.27(a)(4)] The door(s) to the toilet room does not open inward.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Re-install the toilet room door(s) to open inward in accordance with the San Francisco Building Code.
M15	[SFHC Art. 29 § 29.31(j)] Residential use or sleeping rooms are found inside the massage establishment. Massage facilities shall not maintain rooms used for sleeping or residential use.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (6) (A) Administrative fine: Up to \$1,000. • SEC. 29.45 (a) (6) (B) Permit penalty: None. • SEC. 29.45 (a) (6) (C) Repeat violations: 15-30 day suspension of Massage Business permit and up to \$2,500 fine for second occurrence; 30-60 day suspension of Massage Business permit and up to \$5,000 fine for third occurrence. 	Immediately discontinue using rooms for sleeping and/or residential purposes and convert rooms to non-residential use associated with the massage business operations.

Violation Per SFHC Article 29	Administrative Penalties Per SFHC Article 29	Corrective Action
M16 [SFHC Art. 29 § 29.31(i)] Human trafficking information is not posted as required by the California Civil Code Section 52.6.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (13) (A) Administrative fine: Written warning for first violation, \$250 for second and each subsequent violation within 12 months. • SEC. 29.45 (a) (13) (B) Permit penalty: 30 day suspension of Massage Business Permit for third and subsequent violations. 	Immediately post the required Human Trafficking Information.
M17 [SFHC Art. 29 § 29.27(c)] Adequate ventilation is not provided.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Install ventilation by means of windows or mechanical ventilation in accordance with the San Francisco Building Code.
M18 [SFHC Art. 29 § 29.27(c)] Adequate lighting is not provided.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Provide toilet, dressing and massage rooms with at least 108 lux (10 foot candles) of light. Adequate light must be installed in accordance with the San Francisco Electrical Code before continuing the use of the toilet, dressing rooms or massage rooms.
M19 [SFHC Art. 29 § 29.31(c)] An adequate employee area is not provided. A room separate from the toilet, massage room, steam room or other common area shall be made available to employees at all times.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately provide an adequate employee area at this establishment.
M20 [SFHC Art. 29 § 29.31(a)] Massage establishment is not sanitary.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Immediately clean or replace unsanitary appliances and apparatus.
M21 [SFHC Art. 29 § 29.31(a)(6)(7)] The toilet, tubs and/or showers are not sanitary.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Immediately clean or replace unsanitary toilet, tub and/or shower.
M22 [SFHC Art. 29 § 29.31(g)] Door(s) to treatment room is/are equipped with lock(s). Exterior door is locked while business is open.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (17) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (17) (B) Permit penalty: 15-30 day suspension of Massage Business permit. • SEC. 29.45 (a) (17) (C) Repeat violations: 30-60 day suspension and up to \$2,500 fine for the second occurrence; 60-90 day suspension and up to \$5,000 fine for third and each subsequent occurrence. 	Immediately remove all locking devices or any device designed to prevent, impede, or delay entry into treatment rooms. The exterior door must be unlocked during business hours.
M23 [SFHC Art. 29 § 29.27(b)] The hand washing facilities are inadequate.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately provide handwashing facilities which include: soap dispenser, disposable paper towel, and hot/cold water which are within or adjacent to the toilet rooms.
M24 [SFHC Art. 29 § 29.31(a)(2)] Clean sheets and towels are not provided.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Immediately launder all sheets and towels after each use and provide clean towels and sheets to all customers.
M25 [SFHC Art. 29 § 29.31(a)(1)(4)] All clean linens and towels shall be stored in a suitable space. All soiled linens and towels shall be stored separately in an appropriately labeled receptacle.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Provide separate storage for both clean and soiled towels and linens.
M26 [SFHC Art. 29 § 29.31(a)] Massage table are not clean, damaged or not sanitary.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Provide appropriate tables for conducting massage.
M27 [SFHC Art. 29 § 29.31(j)(1)] Beds are being used in place of or in addition to approved massage tables.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (7) (A) Administrative fine: \$500 • SEC. 29.45 (a) (7) (B) Permit penalty: None. • SEC. 29.45 (a) (7) (C) Repeat violations: Up to \$1,000 fine for second occurrence; 15-30 day suspension and up to \$2,500 fine for third occurrence. 	Immediately remove all beds from the massage rooms.
M28 [SFHC Art. 29 § 29.31(m)] Massage business is operating between the unapproved hours of 10:00 PM and 7:00 AM.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (10) (A) Administrative fine: Up to \$1,000. • SEC. 29.45 (a) (10) (B) Permit penalty: 15-30 day suspension of Massage Business Permit. • SEC. 29.45 (a) (10) (C) Repeat violations: 30-60 day suspension and up to \$2,500 for second occurrence; 60-90 day suspension and up to \$5,000 fine for third and each subsequent occurrence. 	Immediately discontinue from operating the massage establishment between the hours of 10:00 PM and 7:00 AM.
M29 [SFHC Art. 29 § 29.31(h)] Alcoholic beverages or illegal drugs are found inside the establishment. All alcoholic beverages or illegal drugs may not be stored, sold, used or served at any massage establishment.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately remove any alcoholic beverages or drugs from the establishment.
M30 [SFHC Art. 29 § 29.29(b)(2)] Noncompliance with applicable laws, including but not limited to, the facilities requirements set forth by City Building, Planning, Housing, and/or Fire Codes.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	See inspection report for violation details and corrective actions.
M31 [SFHC Art. 29 § 29.31(n)] Massage business advertised for services that violates Article 29.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (15) (A) Administrative fine: \$1,000 fine. • SEC. 29.45 (a) (15) (B) Permit penalty: 30 day suspension of Massage Business permit for second and subsequent violations. 	See inspection report for violation details and corrective actions.
M32 [SFHC Art. 29 § 29.31(o)] Massage business is operating a school or provides instruction in Massage on the premises.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately discontinue operating as a Massage School.
M33 All other violations of the San Francisco Health code Article 29 and any Massage Program Rules and Regulations.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation 	See inspection report for violation details and corrective actions.



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

July 21, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 (“Establishment”), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report (“Incident Report”) and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

1. **Section 29.17(b) Lewd Conduct and Prostitution Prohibited.** Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.
2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.

Director's Determination – Richmond Serenity Spa – 3446 Balboa Street

2. That you shall pay the administrative penalties of **\$7,500** for the occurrence of the violation as follows:
SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

- (3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.

- (A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee

- (12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises.

- (A) Administrative fine: **\$2,500** to be paid by Massage Business permittee, and

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has the right to request a hearing by submitting the attached Director's Hearing Request Form within 15 days from the date this Notice was received. If no request for a hearing is filed with the Director within the appropriate period, the right to request a hearing shall be deemed waived, and the Director's determination shall become final and effective on the 15th day from the date this Notice was received.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this [Article 29](#), any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,



JENNIFER CALLEWAERT, MHS, RPHS
Acting Director of Environmental Health

Attachment:
Director's Hearing Request Form
Director's Hearing Guidelines

Cc:
Property Owners of 3446 Balboa Street: Jing Huang



SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH
DIRECTOR HEARING REQUEST

Case Number: _____	Permit to Operate #: <u>ME 120465</u>	Permit Issued Date: <u>01/08/2024</u>
Business Name (DBA): <u>RICHMOND SERENITY SPA</u>	Permit Holder/Owner: <u>WANG LI YAN/HUANG JING</u>	
Business Address, Zip Code: <u>3446 BALBOA ST SAN FRANCISCO, CA 94121</u>		
EH LOC. ID #: _____	SF Business Account Number: <u>101533</u>	

Environmental Health Proposed Enforcement Action: See attached Notice of Determination.

I request that the Department of Public Health, Environmental Health Branch schedule and hold a Director’s Hearing regarding the proposed enforcement action. I understand that I will be notified in writing of my scheduled hearing date, time, and location.

OR

I do not wish to request a Director’s Hearing for the above case and waive my right to a Director’s Hearing. I understand and accept the Environmental Health Enforcement Action listed in the Notice of Initial Determination.

I understand that this declaration is subject to review by the Department of Public Health, Environmental Health Branch. I declare under penalty of perjury that I am an authorized representative of this business entity and that the information contained herein is true and complete to the best of my knowledge and belief.

Authorized Agent – Print & Signature

Date

DPH Office Use ONLY

Date received: _____

District Health Inspector: _____
Print Name



Director's Hearing Procedures

These rules govern the administration of Director's Hearings held by the Department of Public Health. These procedures were revised to reflect changes to Rule 2, Rule 10(c), and Rule 14 regarding changes to the usual hearing day, the timing of pre-hearing submittals and requests, and the address for the administrative law judge.

1. **Hearing Officer.** The Director of Health ("Director") will appoint a hearing officer to preside over hearings. The hearing officer shall be fair and impartial, without any personal interest in the outcome of the appeal.
2. **Regular Hearings.** The Director's Hearings are open to the public and are held as scheduled on the third Thursday of each month at 1:00 PM in 101 Grove Street, Room 300, unless otherwise noted. Additional hearings may be scheduled on other dates and times to accommodate program needs.
3. **Special Hearings.** Subject to the provision of appropriate notice, the Director may call a special hearing at any time.
4. **Hearing Cancellation.** The Director may cancel any regular or special hearing when notified that there is insufficient business to be conducted or for other reasons. In case of cancellation, parties and members of the public will be notified as soon as reasonably possible that the hearing has been cancelled, and a notice of the cancelled hearing will be posted conspicuously on or near the door of the hearing place prior to the scheduled time of the hearing.
5. **Notice of Hearing.** Notification of the hearing date and time shall be made in the manner required by the applicable Code. Where the Code does not specify a method of providing notice of the hearing, the Department shall serve a copy of the Notice of Hearing in person, by First Class mail, or by electronic mail, at least 10 calendar days prior to the date set for the hearing.
6. **Date of Hearing.** Appeals and other matters to be considered by the Director shall be scheduled for hearing consistent with the timeline required by the applicable Code. Where the applicable Code does not specify a date by which a hearing must be scheduled, the Department shall schedule the hearing within 60 days of receipt of the request for hearing. Announcement at a Director's Hearing of the time and place to which a Director's Hearing is rescheduled or continued shall be deemed sufficient notice and no other notice shall be required for any such rescheduled or continued hearing.
7. **Hearing Continuation.** At the Director's discretion, a scheduled hearing may be continued to the next available date on request.
8. **Order of Agenda.** The Hearing Secretary will set the order in which cases will be heard.

9. **Oath.** At the outset of the hearing, the hearing officer will ask all persons who intend to provide testimony to swear or affirm that they will tell the truth, under penalty of perjury.

10. **Written submittals.** The parties may submit written briefing in advance of the hearing, provided the written submittals meet the following requirements:

- a. **Length.** written submittals may be no more than 8 pages, double spaced, and may include an unlimited number of exhibits.
- b. **Exhibits.** Exhibits may include photographs, maps, drawings, or any other information that is relevant to the appeal.

- c. **Deadline:** Written submittals are optional, but must be delivered no later than five business days prior to the hearing. For example, if a hearing is scheduled to be held at 1 PM on a Thursday, the written submittal must be delivered by no later than 1 PM on the Thursday prior to the hearing. A printed copy of the written submittal must be delivered to

Department of Public Health - Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103

or delivered electronically to Hearing Secretary Saira Nisha (saira.nisha@sfdph.org) and Willow Lancaster (Willow.Lancaster@sfdph.org).

- d. **Delivery to opposing party:**

Where the Department of Public Health has an electronic mail address for the responsible party, it will send a copy of its written submittals to that party by electronic mail. Where the Department of Public Health does not have an electronic address for the responsible party, it will make a copy of its written submittal available for pickup by the appellant at 49 South Van Ness Avenue, Suite 600. Or, on request, the Department of Public Health may send a copy of its written submittal to the mail delivery address listed on the appellant's request for hearing.

11. **Order and Time Limits of Presentations.** Except when the Hearing Officer finds good cause to order the presentations and time allotment, otherwise, the order of presentation of an appeal shall be as follows:

- a. In all cases, the Environmental Health manager, inspector or other staff shall speak first and shall be allowed **seven minutes** to present a timeline of events, relevant testimony, evidence and a recommendation.

- b. Next, the applicant or responsible party shall be allowed **seven minutes** for presentation of relevant testimony and evidence.
- c. **Three minutes** for rebuttal shall be provided to each party, in this same order.

The Hearing Officer may increase the amount of time given to the parties, as circumstances warrant and in the interest of fairness.

The Hearing Secretary will manage the clock and time allowed for each speaker. A tone will designate the end of each allotted speaking period.

- 12. **Rules of evidence.** Hearings need not be conducted according to the technical rules relating to evidence and witnesses. Any relevant evidence shall be admitted if it is reasonably reliable. Hearsay evidence is admissible and may be used for the purpose of supplementing or explaining any direct evidence, but shall not be sufficient in itself to support a finding unless it would be admissible over objection in civil actions in courts of competent jurisdiction, or if the party against whom it is offered does not object. Irrelevant and unduly repetitious evidence may be excluded.
- 13. **Witnesses.** Each party may call and examine witnesses on any matter relevant to the issues of the hearing. The hearing officer may consider the credibility of witnesses.
- 14. **Language interpretation services.** If interpretive services are required they must be requested 5 business days prior to the scheduled hearing. For example, for a hearing at 1 PM on a Thursday, request for interpreter must be made by 1 PM on the previous Thursday. Appellants may request translation services by contacting Hearing Secretary Albert.Felipe@sfdph.org and Willow.Lancaster@sfdph.org .
- 15. **Hearing decision.** The Director will render a final decision within 30 days of the hearing unless the applicable code imposes or allows a different timeframe. The decision will be in writing and sent to the responsible party by first class mail or by electronic mail. The decision shall contain findings of fact, and a determination of the issues presented.
- 16. **Audio Recording.** The Hearing Secretary will record the audio and video of the hearing and this recording is the administrative record for each hearing.

NOTE: Remote online hearings will be audio AND video recorded.



SAN FRANCISCO HEALTH CODE ARTICLE 29, OFFICIAL INSPECTION REPORT

Location Address: 3446 BALBOA ST SAN FRANCISCO CA	Time In: 10:00 AM	Inspection Date: 07/23/2025
Business Name: Richmond Serenity Spa	Time Out: 10:30 AM	Re-Inspection Date:
Owner Name:	Inspection Type: <input type="checkbox"/> Routine <input type="checkbox"/> Complaint <input type="checkbox"/> Re-Inspection <input type="checkbox"/> Consultation <input type="checkbox"/> New Ownership <input type="checkbox"/> Change of Ownership	Facility Permit/License: <input checked="" type="checkbox"/> Valid <input type="checkbox"/> Invalid <input checked="" type="checkbox"/> Posted <input type="checkbox"/> Not Posted
Email:		BAN#/Expiration Date: 03/31/2026
Location ID: ME 120465 Phone: (415) 702-6468		

NOTICE OF VIOLATION

Issued to: Establishment Owner _____
 Massage Practitioner _____

Following this Notice of Violation, **the Director** will issue a Notice of Determination that the Massage Practitioner or Massage Business has operated in violation of this Article 29.

See Violations: _____

The Director intends to take enforcement action against the Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s), and the nature of that action, including potential administrative penalty and enforcement costs to be imposed, and/or suspension or revocation of the Massage Practitioner and/or Massage Establishment permit(s).


The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has the right to request a hearing before the Director within fifteen (15) days after a Notice of Determination is issued, which request must be made in writing.


Employees Present:	BAN or License Number & Expiration Date	CAMTC	DPH	NOV Issued

Observations:

.Notes
Status: YES
Observations: Site visit conducted with Sr. Inspector D. Lee.
 Dropped off and reviewed Notice of Determination with business owner, Liyan Wang.
 Dropped off Director's Hearing Request & Guidelines. Written request for hearing must be sent to DPH staff no later than Thursday, 8/7/2025.

Please be advised that inspections by the Department of Public Health staff are not intended to take the place of other regulatory agency inspections. Additional violations of laws and regulations enforced by other agencies may be present.

Ivy Phan  (415) 252-3986
 Name and Signature of Inspector/Investigator and Phone Number

Liyan Wang 
 Name and Signature of Business Operator/Practitioner

Representative refused to sign. Inspection findings were explained and a copy was left with: _____

Violation Per SFHC Article 29	Administrative Penalties Per SFHC Article 29	Corrective Action
M1 [SFHC Art. 29 §29.25] You are currently operating a massage establishment without a SFDPH permit. You must cease and desist from operating a massage establishment until you have received a permit.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (1) (A) Administrative fine: Up to \$1,000 per day of operating without a permit; and • SEC. 29.45 (a) (1) (B) Permit penalty: Business location and Owner of Massage Business ineligible for a Massage Business permit for 180 days. • SEC. 29.45 (a) (1) (C) Repeat violations: Same penalties as (a) (1) (A) and (a) (1) (B). 	Immediately submit all application materials, pay applicable fees and obtain a permit prior to operating a massage establishment.
M2 [SFHC Art. 29 §29.31(k)] Every permit to operate a Massage Establishment must be posted in a conspicuous place and readily visible.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (13) (A) Administrative fine: Written warning for first violation, \$250 for second and each subsequent violation within 12 months. • SEC. 29.45 (a) (13) (B) Permit Penalty: 30-day suspension of Massage Business permit for third and subsequent violations. 	Post the Massage Establishment Permit in a location that is readily visible to anyone entering the business.
M3 [SFHC Art. 29 § 29.10, 29.31(e)] One or more of the massage practitioners is currently practicing massage without a SFDPH or CAMTC permit. Massage establishment owners must ensure that all practitioners have a valid license.	<p>Owner:</p> <ul style="list-style-type: none"> • SEC. 29.45 (a) (5) (A) Administrative fine: \$1,000 to be paid by Massage Business permittee. • SEC. 29.45 (a) (5) (B) Permit penalty: None. • SEC. 29.45 (a) (5) (C) Repeat violations: 15-30 day suspension of Massage Business permit and up to \$2,500 fine for second occurrence; 30-60 day suspension or revocation of Massage Business permit and up to \$5,000 fine for third occurrence. <p>Practitioner:</p> <ul style="list-style-type: none"> • SEC. 29.45 (a) (11) (A) Administrative fine: \$500 fine or participation in a Public Health and Safety Program. • SEC. 29.45 (a) (11) (B) Repeat violations: \$1,000 fine for second occurrence; \$1,500 fine for third and each subsequent occurrence and individual ineligible for Massage Practitioner permit for 180 days. 	Immediately discontinue all massage administration for compensation. Submit all application materials, pay applicable fees and obtain a Certificate from CAMTC prior to administering massage for compensation.
M4 [SFHC Art. 29 § 29.15] The massage practitioner must present a valid SFDPH or CAMTC permit card to any health inspector or law enforcement officer upon request. You are not able to provide the requested permit card during the inspection.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (14) (A) Administrative fine: \$250 to be paid by Massage Practitioner or participation in a Public Health and Safety Program. 	Immediately provide a valid SFDPH license certificate or CAMTC ID card and keep the card with you whenever administering massage for compensation.
M5 [SFHC Art. 29 § 29.26] The Massage Establishment Application information submitted was incomplete or incorrect. Application information was missing or incorrect as indicated on the Notice of Violation.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately submit a complete application or required documentation with all forms properly completed.
M6 [SFHC Art. 29 § 29.17(a), 29.31(f)] The massage practitioner's attire is inappropriate and in violation of the SFDPH health code. The Massage Establishment owner is responsible for the conduct of all individuals providing massage for compensation.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (8) (A) Administrative fine: Up to \$ 500 per person found to be improperly attired, to be paid by Massage Business permittee. • SEC. 29.45 (a) (8) (B) Permit penalty: 60 day suspension of Massage Business permit for each person found to be improperly attired. • SEC. 29.45 (a) (8) (C) Repeat violations: Up to \$1,500 fine per person to be paid by Massage Business permittee for second and each subsequent occurrence; 180 -day suspension of Massage Practitioner Permit and revocation of Massage Business permit. 	Immediately discontinue wearing inappropriate attire. Wear clothing that is not transparent, see through or that substantially exposes practitioner's undergarments... breasts, buttocks, or genitals. The massage practitioner shall remain fully clothed while administering massage or when present in the establishment to which the public has access.
M7 [SFHC Art. 29 § 29.17(b), 29.31(f)] The massage practitioner engaged in lewd conduct at the time of the inspection. The Massage Establishment owner is responsible for the conduct of all individuals providing massage for compensation.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (12) (A) Administrative fine: \$ 2,500 to be paid by Massage Business permittee, and • SEC. 29.45 (a) (12) (B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit. • SEC. 29.45 (a) (12) (C) Repeat violations: Revocation; permittee ineligible for subsequent Massage Practitioner or Massage Business Permit for a period of five years from the date of permit revocation. 	Immediately discontinue engaging in any lewd conduct at the permitted massage establishment.
M8 [SFHC Art. 29 § 29.32, 29.33(a)(2)] The massage owner, operator or practitioner prevented or obstructed the Department from conducting an inspection or threatened and/or touched City Staff.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (16) (A) Administrative fine: \$1,000 fine to be paid by Massage Business permittee. • SEC. 29.45 (a) (16) (B) Repeat Violation \$2,500 fine and 30 day suspension of Massage Business permit for second occurrence; revocation of Massage Business permit for third occurrence. 	Discontinue obstructing or preventing the Department from conducting an inspection or threatening, touching, and/or delaying City Staff from entering the massage establishment.
M9 [SFHC Art. 29 §29.31(d)] The massage establishment has a minor working at the establishment and it is unlawful to employ anyone under the age of 18.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (2) (A) Administrative fine: None. • SEC. 29.45 (a) (2) (B) Permit penalty: Mandatory revocation of Massage Business permit. Massage Business permittee ineligible for a subsequent permit for 180 days. 	Immediately discontinue employing anyone under the age of 18.
M10 [SFHC Art. 29 § 29.29(b)(5)] The massage practitioner or owner/operator was charged or convicted of solicitation or pimping as defined in the California Penal Code § 647(a) or (b) and/or the San Francisco Police Code §225 or, any offense listed in SFHC 29.29(b)(5).	<ul style="list-style-type: none"> • SEC. 29.45 (a) (3) (A) Administrative fine: \$5,000 to be paid by Massage Establishment permittee; and • SEC. 29.45 (a) (3) (B) Permit penalty: Mandatory 60-120 days suspension of Massage Establishment permit. • SEC. 29.45 (a) (3) (C) Repeat violations: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location for a period of two years. 	Immediately discontinue administering massage for compensation or operating a massage business. Working in or operating a massage establishment after having been charged or convicted of solicitation or any offense listed in SFHC 29.29(b)(5) is prohibited and subject to SFHC 29.33(a).
M11 [SFHC Art. 29 § 29.29(b)(5)(E)] The massage practitioner or owner/operator was charged or convicted of human trafficking as defined in the California Penal Code § 236.1.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (4) (A) Administrative fine: None. • SEC. 29.45 (a) (4) (B) Permit penalty: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location. • SEC. 29.45 (a) (4) (C) Repeat violations: Same penalty as (a) (4) (B). 	Immediately discontinue administering massage for compensation or operating a massage business. Working in or owning a massage establishment after having been charged or convicted of human trafficking is prohibited and subject to SFHC 29.33(a).
M12 [SFHC Art. 29 § 29.27(a)(1), 29.31(a)] The shower room ceiling and/or wall are not made of waterproof, hard, nonabsorbent materials which could be easily cleaned.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Discontinue using the shower rooms until proper ceilings and/or walls are installed in accordance with the San Francisco Building Code.
M13 [SFHC Art. 29 § 29.27(a)(2), 29.31(a)] Improper or inadequate plumbing fixtures in toilet rooms or rooms used for tubs, steam, bath, and showers	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Discontinue using the shower rooms until proper plumbing fixtures are installed in accordance with the San Francisco Plumbing Code.
M14 [SFHC Art. 29 § 29.27(a)(4)] The door(s) to the toilet room does not open inward.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Re-install the toilet room door(s) to open inward in accordance with the San Francisco Building Code.
M15 [SFHC Art. 29 § 29.31(j)] Residential use or sleeping rooms are found inside the massage establishment. Massage facilities shall not maintain rooms used for sleeping or residential use.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (6) (A) Administrative fine: Up to \$1,000. • SEC. 29.45 (a) (6) (B) Permit penalty: None. • SEC. 29.45 (a) (6) (C) Repeat violations: 15-30 day suspension of Massage Business permit and up to \$2,500 fine for second occurrence; 30-60 day suspension of Massage Business permit and up to \$5,000 fine for third occurrence. 	Immediately discontinue using rooms for sleeping and/or residential purposes and convert rooms to non-residential use associated with the massage business operations.

Violation Per SFHC Article 29	Administrative Penalties Per SFHC Article 29	Corrective Action
M16 [SFHC Art. 29 § 29.31(i)] Human trafficking information is not posted as required by the California Civil Code Section 52.6.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (13) (A) Administrative fine: Written warning for first violation, \$250 for second and each subsequent violation within 12 months. • SEC. 29.45 (a) (13) (B) Permit penalty: 30 day suspension of Massage Business Permit for third and subsequent violations. 	Immediately post the required Human Trafficking Information.
M17 [SFHC Art. 29 § 29.27(c)] Adequate ventilation is not provided.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Install ventilation by means of windows or mechanical ventilation in accordance with the San Francisco Building Code.
M18 [SFHC Art. 29 § 29.27(c)] Adequate lighting is not provided.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Provide toilet, dressing and massage rooms with at least 108 lux (10 foot candles) of light. Adequate light must be installed in accordance with the San Francisco Electrical Code before continuing the use of the toilet, dressing rooms or massage rooms.
M19 [SFHC Art. 29 § 29.31(c)] An adequate employee area is not provided. A room separate from the toilet, massage room, steam room or other common area shall be made available to employees at all times.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately provide an adequate employee area at this establishment.
M20 [SFHC Art. 29 § 29.31(a)] Massage establishment is not sanitary.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Immediately clean or replace unsanitary appliances and apparatus.
M21 [SFHC Art. 29 § 29.31(a)(6)(7)] The toilet, tubs and/or showers are not sanitary.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Immediately clean or replace unsanitary toilet, tub and/or shower.
M22 [SFHC Art. 29 § 29.31(g)] Door(s) to treatment room is/are equipped with lock(s). Exterior door is locked while business is open.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (17) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (17) (B) Permit penalty: 15-30 day suspension of Massage Business permit. • SEC. 29.45 (a) (17) (C) Repeat violations: 30-60 day suspension and up to \$2,500 fine for the second occurrence; 60-90 day suspension and up to \$5,000 fine for third and each subsequent occurrence. 	Immediately remove all locking devices or any device designed to prevent, impede, or delay entry into treatment rooms. The exterior door must be unlocked during business hours.
M23 [SFHC Art. 29 § 29.27(b)] The hand washing facilities are inadequate.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately provide handwashing facilities which include: soap dispenser, disposable paper towel, and hot/cold water which are within or adjacent to the toilet rooms.
M24 [SFHC Art. 29 § 29.31(a)(2)] Clean sheets and towels are not provided.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Immediately launder all sheets and towels after each use and provide clean towels and sheets to all customers.
M25 [SFHC Art. 29 § 29.31(a)(1)(4)] All clean linens and towels shall be stored in a suitable space. All soiled linens and towels shall be stored separately in an appropriately labeled receptacle.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Provide separate storage for both clean and soiled towels and linens.
M26 [SFHC Art. 29 § 29.31(a)] Massage table are not clean, damaged or not sanitary.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (9) (A) Administrative fine: None. • SEC. 29.45 (a) (9) (B) Permit penalty: None. • SEC. 29.45 (a) (9) (C) Repeat violations: Up to \$250 fine and 60-day suspension of Massage Business permit. 	Provide appropriate tables for conducting massage.
M27 [SFHC Art. 29 § 29.31(j)(1)] Beds are being used in place of or in addition to approved massage tables.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (7) (A) Administrative fine: \$500 • SEC. 29.45 (a) (7) (B) Permit penalty: None. • SEC. 29.45 (a) (7) (C) Repeat violations: Up to \$1,000 fine for second occurrence; 15-30 day suspension and up to \$2,500 fine for third occurrence. 	Immediately remove all beds from the massage rooms.
M28 [SFHC Art. 29 § 29.31(m)] Massage business is operating between the unapproved hours of 10:00 PM and 7:00 AM.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (10) (A) Administrative fine: Up to \$1,000. • SEC. 29.45 (a) (10) (B) Permit penalty: 15-30 day suspension of Massage Business Permit. • SEC. 29.45 (a) (10) (C) Repeat violations: 30-60 day suspension and up to \$2,500 for second occurrence; 60-90 day suspension and up to \$5,000 fine for third and each subsequent occurrence. 	Immediately discontinue from operating the massage establishment between the hours of 10:00 PM and 7:00 AM.
M29 [SFHC Art. 29 § 29.31(h)] Alcoholic beverages or illegal drugs are found inside the establishment. All alcoholic beverages or illegal drugs may not be stored, sold, used or served at any massage establishment.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately remove any alcoholic beverages or drugs from the establishment.
M30 [SFHC Art. 29 § 29.29(b)(2)] Noncompliance with applicable laws, including but not limited to, the facilities requirements set forth by City Building, Planning, Housing, and/or Fire Codes.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	See inspection report for violation details and corrective actions.
M31 [SFHC Art. 29 § 29.31(n)] Massage business advertised for services that violates Article 29.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (15) (A) Administrative fine: \$1,000 fine. • SEC. 29.45 (a) (15) (B) Permit penalty: 30 day suspension of Massage Business permit for second and subsequent violations. 	See inspection report for violation details and corrective actions.
M32 [SFHC Art. 29 § 29.31(o)] Massage business is operating a school or provides instruction in Massage on the premises.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	Immediately discontinue operating as a Massage School.
M33 All other violations of the San Francisco Health code Article 29 and any Massage Program Rules and Regulations.	<ul style="list-style-type: none"> • SEC. 29.45 (a) (18) (A) Administrative fine: Up to \$1,000 fine. • SEC. 29.45 (a) (18) (B) Permit penalty: Possible suspension or revocation. • SEC. 29.45 (a) (18) (C) Repeat violations: Up to \$2,500 fine for the second violation and possible permit suspension or revocation; up to \$5,000 for the third and subsequent violations, and permit suspension or revocation. 	See inspection report for violation details and corrective actions.



PROOF OF SERVICE

I, Ivy Phan, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On July 23, 2025 I served the following document(s):

- Notice of Violation
- Notice of Hearing
- Director's Hearing Order
- SFDPH Hearing Brief
- Other: Notice of Determination and DH Request & Guidelines

on the following persons at the locations specified:

Richmond Serenity Spa
c/o Liyan Wang & Jing Huang
3446 Balboa St
San Francisco, CA 94121

in the manner indicated below:

HAND DELIVERY: I handed the documents to the person whose name and signature are:

Recipient Name Liyan Wang Signature please see site visit report dated 7/23/25

BY U.S. POSTAL SERVICE CERT# 9589 0710 5270 2373 5282 87

BY POSTING: I posted the document(s) in a conspicuous place on the building, structure or property

BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: _____

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed July 23, 2025 at San Francisco, California.

Ivy Phan
Ivy Phan

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

RICHMOND JEREMY OPA
 90 MIAN WANG + JIM
 3446 BAYVIEW ST
 SAN FRANCISCO, CA 94114



9590 9402 9391 5002 6408 03

2. Article Number (Transfer from service label)

9589 0710 5270 2373 5282 87

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Handwritten Signature]

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? Yes
- If YES, enter delivery address below: No

3. Service Type

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- Adult Signature Restricted Delivery
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- Certified Mail Restricted Delivery
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- Registered Mail Restricted Delivery
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City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

London N. Breed, Mayor
Grant Colfax, MD, Director of Health
Patrick Fosdahi, MS, REHS
Director of Environmental Health

SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH DIRECTOR'S HEARING REQUEST

Case Number: _____	Permit to Operate #: <u>ME 120465</u>	Permit Issued: <u>01/08/2024</u>
Business Name (DBA): <u>RICHMOND SERENITY SPA</u>	Permit Holder/Owner: <u>WANG LI YAN/HUANG JING</u>	
Business Address, Zip Code: <u>3446 BALBOA ST SAN FRANCISCO, CA 9412</u>		
EH LOC ID #: _____	SF Business Account Number: <u>1011533</u>	

Environmental Health Proposed Enforcement Action: See attached Notice of Determination.

I request that the Department of Public Health, Environmental Health Branch schedule and hold a Director's Hearing regarding the proposed enforcement action. I understand that I will be notified in writing of my scheduled hearing date, time, and location.

OR

I do not wish to request a Director's Hearing for the above case and waive my right to a Director's Hearing. I understand and accept the Environmental Health Enforcement Action listed in the Notice of Initial Determination.

I understand that this declaration is subject to review by the Department of Public Health, Environmental Health Branch. I declare under penalty of perjury that I am an authorized representative of this business entity and that the information contained herein is true and complete to the best of my knowledge and belief.

Wang Li Yan Jing Huang

Authorized Agent - Print & Signature

07/25/2025
Date

LIYAN WANG JING HUANG

DPH Office Use ONLY	
Date Received: <u>8/6/2025</u>	District Health Inspector: <u>Ivy Phan</u>
	Print Name



Notice of Hearing

For a translation of this Notice, please call the inspector's phone number listed below.
Para una traducción de este aviso, por favor llame al número de teléfono del inspector que aparece a continuación.
欲索取本通知的翻譯本，請打下列電話號碼給檢查員。
Para sa isang pagsasalin ng Abiso na ito, mangyaring tawagan ang numero ng telepono ng inspektor na nakalista sa ibaba.

Date: 8/20/2025

Address of Violation(s): 3446 Balboa St San Francisco, CA 94121 **Facility ID#:** N/A

DBA: Richmond Serenity Spa

Property/Business Owner Name: Li Yan Wang/Jing Huang **Email:** richmondserenityspa@gmail.com

Address: 3446 Balboa St San Francisco, CA 94121

Food Housing Massage Tobacco Solid Waste Other: _____

You are hereby ordered to appear at a hearing for failure to comply with the following code section(s):

SFHC Sec 29.17(b) and Sec 29.31(f)

The hearing will be held at 49 So. Van Ness Ave., Rm. 192/194, on the following date and time: 9/18/2025 @ 1PM

Failure to appear may result in one or more of the following: penalties, suspension or revocation of any Permit to Operate, SFDPH initiated refuse collection service, and/or a referral to the San Francisco City Attorney's Office for the above referenced site.

If you would like interpretation services at the Hearing, please inform the Inspector below at least 4 business days before the Hearing.
Si usted desea servicios de interpretación en la audiencia, por favor informe al inspector que aparece a continuación por lo menos 4 días hábiles antes de la audiencia.
如果您需要在聽證會上得到口譯/傳譯服務，請在聽證會之前至少4個工作日通知下列檢查員。
Kung gusto ninyo ng mga serbisyo ng interpretasyon sa Pagdinig, mangyaring ipagbigay-alam sa Inspektor na nakalista sa ibaba ng hindi bababa sa 4 araw ng negosyo bago ang Pagdinig.

Inspector/Investigator: Ivy Phan

Phone: (415) 252-3986 **Email:** ivy.phan@sfdph.org

Daniel Tsai
Director of Health



PROOF OF SERVICE

I, Ivy Phan, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On August 20, 2025 I served the following document(s):

- Notice of Violation
- Notice of Hearing
- Director's Hearing Order
- SFDPH Hearing Brief
- Other: _____

on the following persons at the locations specified:

Richmond Serenity Spa
c/o Li Yan Wang/Jing Huang
3446 Balboa St
San Francisco, CA 94121

richmondserenityspa@gmail.com; cc: pvh831@gmail.com

in the manner indicated below:

HAND DELIVERY: I handed the documents to the person whose name and signature are:

Recipient Name _____ Signature _____

BY U.S. POSTAL SERVICE CERT# 9589 0710 5270 2373 5288 12

BY POSTING: I posted the document(s) in a conspicuous place on the building, structure or property

BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: ivy.phan@sfdph.org

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed August 20, 2025 at San Francisco, California.

Ivy Phan
Ivy Phan

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OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

LIYAN WANG JING HUANG
RICHMOND JEREMY SPA
3446 BAYVIEW ST
SAN FRANCISCO, CA 94121



9590 9402 9391 5002 6421 42

2. Article Number (Transfer from service label)

9589 0710 5270 2373 5288 12

PS Form 3811, July 2020 PSN 7530-02-000-9053

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 Addressee

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Text & Email Updates





City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

August 25, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Amended Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 (“Establishment”), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report (“Incident Report”) and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

1. **Section 29.17(b) Lewd Conduct and Prostitution Prohibited.** Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.
2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

On July 23, 2025 a Notice of Determination and a Director’s Hearing Request Form were issued to the business owner. The notice provided details of the violations of the SFHC, Article 29 with corresponding enforcement action.

Director's Determination – Richmond Serenity Spa – 3446 Balboa Street

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That you shall pay the administrative penalty of **\$7,500** and permit penalty of 60 days for the occurrence of the violation as follows:
SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.
 - (3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.
 - (A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee; and
 - (B) Permit Penalty: Mandatory **60-120 days suspension** of Massage Establishment permit.
 - (12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises.
 - (A) Administrative fine: \$2,500 to be paid by Massage Business permittee

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has exercised the right to request a hearing and submitted a Director's Hearing Request Form, received on August 6, 2025. On August 20 2025, case #MSG-25-03 was generated and a Notice of Hearing was issued in response to the request.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this [Article 29](#), any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,



Jennifer Callewaert, MS, REHS
Acting Director of Environmental Health

Cc:
Property Owners of 3446 Balboa Street: Jing Huang



PROOF OF SERVICE

I, Ivy Phan, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On August 25, 2025 I served the following document(s):

- Notice of Violation
- Notice of Hearing
- Director's Hearing Order
- SFDPH Hearing Brief
- Other: Amended NOD

on the following persons at the locations specified:

Richmond Serenity Spa
(c/o Liyan Wang & Jing Huang)
3446 Balboa Street
San Francisco, CA 94121

richmondserenityspa@gmail.com cc: pvh831@gmail.com

in the manner indicated below:

HAND DELIVERY: I handed the documents to the person whose name and signature are:

Recipient Name _____ Signature _____

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BY POSTING: I posted the document(s) in a conspicuous place on the building, structure or property


BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: ivy.phan@sfdph.org

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed August 25, 2025 at San Francisco, California.

Ivy Phan
Ivy Phan

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (<i>Printed Name</i>)</p> <p>C. Date of Delivery</p>																
<p>1. Article Addressed to:</p> <p>RICHMOND JEREMY CPA (c/o UYAN NANG Z) JING HUANG 3446 BAUBOA CT SAN FRANCISCO, CA 94132</p>  <p>9590 9402 9391 5002 6420 74</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
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<p>2. Article Number (<i>Transfer from service label</i>)</p> <p>9589 0710 5270 2373 5288 50</p>																	
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<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
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City, State, ZIP+4® SF, CA 94132	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

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City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

August 27, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Amended Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 (“Establishment”), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report (“Incident Report”) and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

1. **Section 29.17(b) Lewd Conduct and Prostitution Prohibited.** Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.
2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

On July 23, 2025 a Notice of Determination (NOD) and a Director’s Hearing Request Form were issued to the business owner. The notice provided details of the violations of the SFHC, Article 29 with corresponding enforcement action.

On August 25, 2025 an amended NOD was issued to the business owner and counsel. The notice included a permit penalty pursuant to sec 29.45 (3)(b).

Director's Determination – Richmond Serenity Spa – 3446 Balboa Street

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That your Massage Establishment Health Permit #ME-120465 shall be revoked.
3. That business owners, Liyan Wang and Jing Huang, shall be ineligible for a Massage Business Permit for a period of five years from the date of permit revocation.
4. That you shall pay the administrative penalty of **\$7,500** for the occurrence of the violation as follows: SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.

(A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee

(4) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises

(A) Administrative fine: \$2,500 to be paid by Massage Business permittee, and

(B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has exercised the right to request a hearing and submitted a Director's Hearing Request Form, received on August 6, 2025. On August 20 2025, case #MSG-25-03 was generated and a Notice of Hearing was issued in response to the request.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this [Article 29](#), any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,



Jennifer Callewaert, MS, REHS
Acting Director of Environmental Health

Cc:
Property Owners of 3446 Balboa Street: Jing Huang



PROOF OF SERVICE

I, Ivy Phan, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On August 27, 2025 I served the following document(s):

- Notice of Violation
- SFDPH Hearing Brief
- Notice of Hearing
- Other: Amended Notice of Determination dated 8/27/2025
- Director's Hearing Order

on the following persons at the locations specified:

Richmond Serenity Spa
(c/o Liyan Wang & Jing Huang)
3446 Balboa Street
San Francisco, CA 94121

to: richmondserenityspa@gmail.com, pvh831@gmail.com

in the manner indicated below:

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Recipient Name _____ Signature _____

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BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: ivy.phan@sfdph.org

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed August 27, 2025 at San Francisco, California.

Ivy Phan

Ivy Phan

CERTIFIED MAIL®



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SFDPH

ENVIRONMENTAL HEALTH BRANCH

Massage Program

49 South Van Ness Avenue, Suite 600

San Francisco, CA 94103

RICHMOND SEREMTY SPA
(C/O LYAN WANG & JIM HUANG)
3446 BALBOA ST
SAN FRANCISCO, CA 94121

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Postage	\$
Total Postage and Fees	\$

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City, State, ZIP+4® SAN FRANCISCO, CA 94121

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(<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates





Re: 3446 Balboa Street - Case #MSG 25-03

From Paul <pvh831@gmail.com>

Date Tue 9/16/2025 12:31 PM

To Phan, Ivy (DPH) <ivy.phan@sfdph.org>

Cc Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>

Dear Ivy:

The date and time (10/22/2025 @ 9AM) of the upcoming hearing are tentatively acceptable to us.

Please promptly confirm:

(1) that the place of the Hearing is 101 Grove Street, Room 300 (no longer at 49 South Van Ness Ave.);

(2) that the deadline for document submission is 10/15/2025 @ 9AM; and

(2) the name of the assigned impartial Hearing Officer.

Thank you,

Paul

Paul Horcher, Attorney for Liyan Wang/Jing Huang, Richmond Serenity Spa, 3446 Balboa Street San Francisco, CA 94121

亲爱的艾维:

即将举行的听证会的日期和时间 (2025年10月22日上午9点) 对我们来说初步可接受。

请及时确认:

(1) 听证会地点是101 Grove Street, 300号房间 (不再是49 South Van Ness Ave.) ;

(2) 文件提交截止日期为2025年10月15日上午9点; 以及

(3) 指定的公正听证官的名字。

谢谢, 保罗

保罗·霍尔彻, 丽言王/京黄, 里士满宁静水疗, 3446 Balboa Street, 旧金山, 加利福尼亚州94121

On Tue, Sep 16, 2025 at 10:39 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Good Morning,

Exhibit J

You will find the Notice of Hearing for your upcoming Director's Hearing case attached. A hard copy will also be mailed out to the establishment.

Please confirm your availability for the hearing, so we can get started on acquiring a Mandarin interpreter as soon as possible.

Thank You,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Sent: Wednesday, August 27, 2025 10:05 AM
To: Paul <pvh831@gmail.com>; Serenity Spa <richmondserenityspa@gmail.com>
Cc: Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

Good Morning:

Please find the second amended Notice of Determination attached to this email. A hard copy will also be mailed out to the business and property owner(s). Once again, a Request for Hearing Form will not be sent out as we've already received the written request for hearing on 8/6/2025.

DPH acknowledges and grants your request for a continuance - we will be rescheduling this case to October 2025. The Notice of Hearing will be sent out at a later date.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Paul <pvh831@gmail.com>
Sent: Monday, August 25, 2025 4:19 PM
To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Cc: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

Dear Ivy:

With the new additional penalty demand of **60 days suspension** in addition to the \$7,500.00 in fines, the Amended NOD we just received is a material change and we will need additional time to prepare our defense; therefore I need to withdraw my availability for the September 18, 2025 Hearing date and request that the Hearing be accordingly scheduled for October 2025 at the earliest.

Thanks,

Paul

Atty for Liyan Wang and Jing Wang, 3446 Balboa St.

On Mon, Aug 25, 2025 at 9:14 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Thank you. The request for Mandarin interpretation has been made; we're still working on securing an interpreter at this time.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Paul <pvh831@gmail.com>
Sent: Monday, August 25, 2025 9:10 AM
To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning, Ivy.
I intend to be there.
Please confirm Mandarin interpretation.
Thanks!
Paul

On Mon, Aug 25, 2025 at 9:06 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Hello:

Please confirm availability for the scheduled hearing date.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Sent: Wednesday, August 20, 2025 10:10 AM
To: Serenity Spa <richmondserenityspa@gmail.com>
Cc: Paul <pvh831@gmail.com>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>
Subject: 3446 Balboa Street - Case #MSG 25-03

Good Morning,

Please find the Notice of Hearing for your upcoming Director's Hearing case attached. A hard copy will also be mailed out to the establishment.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

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Notice of Hearing

For a translation of this Notice, please call the inspector's phone number listed below.
Para una traducción de este aviso, por favor llame al número de teléfono del inspector que aparece a continuación.
欲索取本通知的翻譯本，請打下列電話號碼給檢查員。
Para sa isang pagsasalin ng Abiso na ito, mangyaring tawagan ang numero ng telepono ng inspektor na nakalista sa ibaba.

Date: 9/16/2025

Address of Violation(s): 3446 Balboa Street San Francisco, CA 94121

Permit #: ME 120465

DBA: Richmond Serenity Spa

Property/Business Owner Name: Liyan Wang/Jing Huang

Email: richmondserenityspa@gmail.com

Address: 3446 Balboa Street San Francisco, CA 94121

Food Housing Massage Tobacco Solid Waste Other: _____

You are hereby ordered to appear at a hearing for failure to comply with the following code section(s):

SFHC Sec 29.17(b) and 29.31(f)

The hearing will be held at 101 Grove St, Rm 300, on the following date and time:

10/22/2025 @ 9AM

Failure to appear may result in one or more of the following: penalties, suspension or revocation of any Permit to Operate, SFDPH initiated refuse collection service, and/or a referral to the San Francisco City Attorney's Office for the above referenced site.

If you would like interpretation services at the Hearing, please inform the Inspector below at least 4 business days before the Hearing.
Si usted desea servicios de interpretación en la audiencia, por favor informe al inspector que aparece a continuación por lo menos 4 días hábiles antes de la audiencia.
如果您需要在聽證會上得到口譯/傳譯服務，請在聽證會之前至少4個工作日通知下列檢查員。
Kung gusto ninyo ng mga serbisyo ng interpretasyon sa Pagdinig, mangyaring ipagbigay-alam sa Inspektor na nakalista sa ibaba ng hindi bababa sa 4 araw ng negosyo bago ang Pagdinig.

Inspector/Investigator: Ivy Phan

Phone: (415) 252-3986 Email: ivy.phan@sfdph.org

Daniel Tsai
Director of Health



PROOF OF SERVICE

I, Ivy Phan, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On September 16, 2025 I served the following document(s):

- Notice of Violation
- Notice of Hearing
- Director's Hearing Order
- SFDPH Hearing Brief
- Other: _____

on the following persons at the locations specified:

Richmond Serenity Spa
c/o Liyan Wang & Jing Huang
3446 Balboa St
San Francisco, CA 94121

emailed to: pvh831@gmail.com & richmondserenityspa@gmail.com

in the manner indicated below:

HAND DELIVERY: I handed the documents to the person whose name and signature are:

Recipient Name _____ Signature _____

BY U.S. POSTAL SERVICE

BY POSTING: I posted the document(s) in a conspicuous place on the building, structure or property

BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: ivy.phan@sfdph.org

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed September 16, 2025 at San Francisco, California.

Ivy Phan

Ivy Phan



Re: URGENT: DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa St. - Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended NOD

From Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Date Wed 10/29/2025 4:03 PM
To Paul <pvh831@gmail.com>

Received. I'll put in the request now.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986
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From: Paul <pvh831@gmail.com>
Sent: Wednesday, October 29, 2025 3:34 PM
To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Subject: Re: URGENT: DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa St. - Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended NOD

Dear Ivy:
The date, time, and place of the upcoming 11-20-25 hearing are suitable; please request Mandarin interpretation services.
Regards,
Paul Horcher, Atty for Richmond Serenity Spa, 3446 Balboa Street

On Tue, Oct 28, 2025 at 1:30 PM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Hello Paul:

Please find the updated Notice of Hearing attached. Please confirm if the date and time are suitable so that I can request Mandarin interpretation services.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Paul <pvh831@gmail.com>

Sent: Tuesday, October 14, 2025 2:44 PM

To: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>

Cc: Phan, Ivy (DPH) <ivy.phan@sfdph.org>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>; Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>

Subject: Re: URGENT: DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa St. - Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended NOD

Dear Jennifer and The Team:

Thanks for the update.

Confirming that the erstwhile 10-22-25 hearing date and the 10-15-25 document submission deadline are both vacated and that the DH Coordinator team will follow up and confirm with me with a new date and time for the Hearing.

The third Thursday of next month (11-20-25) tentatively looks good.

Best wishes,

Paul

Paul Horcher, Attorney for Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa Street.

On Tue, Oct 14, 2025 at 2:02 PM Callewaert, Jennifer (DPH) <ennifer.callewaert@sfdph.org> wrote:

Hi Mr. Horcher,

After my review, it appears there was an auto-correct error when creating the second administrative penalty section in the Notice of Determination (NOD). It should have been labeled as (12), but was mistakenly auto-corrected to (4), following (3). Please see the updated NOD, which confirms that no substantive changes have been made—the penalty still references Section 29.17 (Lewd Act).

That said, DPH will be able to reschedule your hearing, which must take place no later than November 26th. The DH Coordinator team will follow up with a new date and time. Hearings are

typically held on the third Thursday of each month, but the team will confirm the exact date and time with you.

Removing Patrick, as he's since retired.

Sincerely,

Jen Callewaert MS, REHS

Acting Director, Environmental Health Branch

Pronouns: She/Her/Hers

Population Health Division
San Francisco Department of Public Health
49 South Van Ness Avenue, Suite 600 | San Francisco, CA 94103
415-252-3971 (direct)
jennifer.callewaert@sfdph.org
SF.gov/ehb

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From: Paul <pvh831@gmail.com>
Sent: Tuesday, October 14, 2025 6:34 AM
To: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>
Cc: Fosdahl, Patrick (DPH) <Patrick.Fosdahl@sfdph.org>; Phan, Ivy (DPH) <ivy.phan@sfdph.org>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>; Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>
Subject: URGENT: DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa St. - Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended NOD

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Dear Acting Director of Environmental Health Jennifer Callewaert and Interested Parties:

Good morning.

Attached please find the subject courtesy notice.

Sincerely,



Attorney for Jing Huang and Liyan Wang dba Richmond Serenity Spa

Paul V Horcher, Esq. "pvh831@gmail.com" (he/him/his)

601 Van Ness Ave., #928

San Francisco CA 94102-3257

Tel/Text (909) 861-5555, Fax (415) 301-4262, and WeChat: paulvhorcher

Exhibit L

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PAUL V. HORCHER, *Attorney at Law*

601 Van Ness Ave., #928, San Francisco CA 94102-3257

Tel: (909) 861-5555 Fax: (415) 301-4262 Email: "pvh831@gmail.com"

October 14, 2025

via email

Jennifer Callewaert, Acting Director of Environmental Health
San Francisco Dept. of Public Health ("DPH")
49 S. Van Ness Ave, Suite 600
San Francisco CA 94103

Re: **Courtesy Notice of Ambiguous and Objectionable 08-27-25 (2nd) Amended Notice of Determination (NOD).**

DPH vs. Jing Huang and Liyan Wang dba Richmond Serenity Spa, 3446 Balboa St. #1, San Francisco CA 94121

Dear Acting Director Callewaert:

It has come to light that the subject notice appears to be materially and fatally at variance with both your original *NOD* and *1st amended NOD* in that, in addition to the escalating unwarranted and draconian permit revocation and financial penalties, you are also ordering my clients to pay a \$2,500.00 administrative penalty for occurrence of the alleged violation as proscribed by *San Francisco Health Code ("SFHC")* "**§29.45(a)(4)**," (emphasis added) the *SFHC* § that your Order cited.

It is important to clarify that *SFHC* §29.45(a)(4) is irrelevant and **does not** authorize the imposition of an administrative fine.

The text of the section is as follows:

"(4) Trafficking Charges or Convictions, as Defined by California Penal Code Section 236.1, for Anyone Working at Massage Establishment.

(A) *Administrative fine: None.* (emphasis added).

(B) *Permit penalty: Revocation; permittee ineligible for a subsequent Massage Establishment permit at any location.*

(C) *Repeat violations: Same penalty as (a)(4)(B).*"

In 2021, an SFPD search warrant affidavit reprehensibly and falsely alleged human trafficking felonies at the Spa when it was located at 3443 Balboa St. Now, in 2025, my clients, Jing Huang and Liyan Wang, are deeply distressed that your (2nd) *Amended NOD Order* is now repeating the discredited 2021 SFPD falsehoods by categorizing them as felonious human traffickers—a serious accusation of a loathsome crime punished by serious state prison time, when, in fact, neither has been suspected, charged, or convicted of such a heinous crime.

This letter serves as a formal courtesy notification. If the (2nd) *Amended NOD* is not dropped entirely or further appropriately amended again and the hearing appropriately re-noticed and scheduled for a date next month or later, consistent with ¶¶ 5 and 7 of the *DPH Director's Hearing Procedures* and my clients' procedural due process rights, they will be compelled to pursue a motion to dismiss with prejudice the entire defective 08-27-25 (2nd) *Amended NOD*, *inter alia*.

Thank you for your anticipated cooperation.



Paul V. Horcher, Attorney for Jing Huang and Liyan Wang

cc: Clients, interested parties.



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Daniel Lurie, Mayor
Daniel Tsai, Director of Health
Jennifer Callewaert MS, REHS
Acting Director of Environmental Health

October 14, 2025

Liyan Wang & Jing Huang
3446 Balboa Street
San Francisco, CA 94121

RE: Amended Notice of Determination – Richmond Serenity Spa – 3446 Balboa St, San Francisco

Dear Liyan Wang & Jing Huang,

As the owner of Richmond Serenity Spa located at the 3446 Balboa Street in the City and County of San Francisco, Massage Health Permit #ME-120465 (“Establishment”), you are hereby notified that the Establishment is in violation of the following provision(s) of the San Francisco Health Code (SFHC), Article 29, which were observed and documented on a June 17, 2025 San Francisco Police Department (SFPD) Incident Report (“Incident Report”) and outlined in the Notice of Violation Inspection Report dated July 16, 2025:

1. **Section 29.17(b) Lewd Conduct and Prostitution Prohibited.** Massage Practitioners shall not engage in lewd conduct or prostitution on business premises, including locations designated by the client through an Outcall Massage Service. Lewd conduct includes, but is not limited to: the performance of acts or simulated acts of sexual intercourse, masturbation, bestiality, copulation (oral, anal or vaginal), or flagellation; the actual or simulated caressing or fondling by one adult human being of the anus or genitals of another adult human being; the actual or simulated displaying of the pubic hair, anus, vagina, penis, vulva, buttocks, areola, or any other external genitalia of the human body.
2. **Section 29.31(f) Practitioner Conduct.** Massage Establishments shall be responsible for the conduct of all individuals providing Massage for Compensation on their business premises and shall ensure that such individuals do not wear improper attire or engage in lewd conduct as set forth in Section 29.17.

Per the Incident Report, an unidentified employee of the Establishment, engaged in a lewd act while conducting a massage on an undercover SFPD Officer. Specifically, while the officer was laying nude on his back, exposing his genitals fully. The unidentified practitioner solicited sexual services, including masturbation of the genitals.

On July 16, 2025, the San Francisco Department of Public Health-Environmental Health Branch (SFDPH) massage team conducted an inspection of the establishment, issuing a Notice of Violation to Liyan Wang & Jing Huang for the health code violations above.

On July 23, 2025 a Notice of Determination (NOD) and a Director’s Hearing Request Form were issued to the business owner. The notice provided details of the violations of the SFHC, Article 29 with corresponding enforcement action.

On August 25, 2025 an amended NOD was issued to the business owner and counsel. The notice included a permit penalty pursuant to sec 29.45 (3)(b).

Director's Determination – Richmond Serenity Spa – 3446 Balboa Street

Based on the findings set forth above, the Director HEREBY ORDERS:

1. That you and your practitioners shall immediately discontinue engaging in lewd conduct at the Establishment.
2. That your Massage Establishment Health Permit #ME-120465 shall be revoked.
3. That business owners, Liyan Wang and Jing Huang, shall be ineligible for a Massage Business Permit for a period of five years from the date of permit revocation.
4. That you shall pay the administrative penalty of **\$7,500** for the occurrence of the violation as follows: SEC. 29.45(a). VIOLATIONS AND ADMINISTRATIVE PENALTIES.

(3) Solicitation of Lewd Conduct or Prostitution in Violation of Section 29.17; Solicitation Citations, Charges, or Convictions, as defined by California Penal Code, Section 647 (a) or (b) and/or San Francisco Police Code, Section 225, for Anyone Working at Massage Establishment.

(A) Administrative fine: **\$5,000** to be paid by Massage Establishment permittee

(12) Anyone Engaged in Lewd Conduct or Performing Sex Acts as Defined in Section 29.17(b) on Massage Business Premises

(A) Administrative fine: \$2,500 to be paid by Massage Business permittee, and

(B) Permit penalty: Revocation of Massage Practitioner permit and revocation of Massage Business permit

The Massage Practitioner, Massage Business, owner of real property, and/or any other Person deemed responsible for causing the violation(s) has exercised the right to request a hearing and submitted a Director's Hearing Request Form, received on August 6, 2025. On August 20 2025, case #MSG-25-03 was generated and a Notice of Hearing was issued in response to the request.

Pursuant to SFHC, Article 29 §29.33(a)(3) The Director may revoke or suspend any Massage Establishment, Sole Practitioner Massage Establishment, or Outcall Massage Service permit, after a hearing, if the Director finds the permittee or the permittee's agent, employee, or independent contractor has engaged in any conduct in connection with the operation of the business that violates the operating requirements set forth in this [Article 29](#), any rules or regulations related to Massage Business operations, or any State or local laws relating to the practice of Massage or the operation of a Massage Business

If you have any question, please contact Environmental Health Inspector Ivy Phan at 415-252-3986 or ivy.phan@sfdph.org.

Sincerely,



Jennifer Callewaert, MS, REHS
Acting Director of Environmental Health

Cc:

Property Owners of 3446 Balboa Street: Jing Huang



PROOF OF SERVICE

I, Jennifer Callewaert, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On October 14, 2025 I served the following document(s):

- Notice of Violation
- Notice of Hearing
- Director's Hearing Order
- SFDPH Hearing Brief
- Other: Notice of Determination dated 10/14/2025

on the following persons at the locations specified:

Richmond Serenity Spa
(c/o Liyan Wang & Jing Huang)
3446 Balboa Street
San Francisco, CA 94121

to: richmondserenityspa@gmail.com, pvh831@gmail.com

in the manner indicated below:

HAND DELIVERY: I handed the documents to the person whose name and signature are:

Recipient Name _____ Signature _____

BY U.S. POSTAL SERVICE

BY POSTING: I posted the document(s) in a conspicuous place on the building, structure or property

BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: jennifer.callewaert@sfdph.org

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed October 14, 2025 at San Francisco, California.

Jennifer Callewaert
Jennifer Callewaert



Notice of Hearing

For a translation of this Notice, please call the inspector's phone number listed below.
Para una traducción de este aviso, por favor llame al número de teléfono del inspector que aparece a continuación.
欲索取本通知的翻譯本，請打下列電話號碼給檢查員。
Para sa isang pagsasalin ng Abiso na ito, mangyaring tawagan ang numero ng telepono ng inspektor na nakalista sa ibaba.

Date: 10/28/2025

Address of Violation(s): 3446 Balboa Street San Francisco, CA 94121 **Permit #:** ME 120465

DBA: Richmond Serenity Spa

Property/Business Owner Name: Liyan Wang & Jing Huang **Email:** richmondserenityspa@gmail.com

Address: 3446 Balboa Street San Francisco, CA 94121

Food Housing Massage Tobacco Solid Waste Other: _____

You are hereby ordered to appear at a hearing for failure to comply with the following code section(s):

SFHC Sec 29.17(b), 29.31(f)

The hearing will be held at 49 So. Van Ness Ave., Rm. 192/194, on the following date and time: 11/20/2025 @ 1PM

Failure to appear may result in one or more of the following: penalties, suspension or revocation of any Permit to Operate, SFDPH initiated refuse collection service, and/or a referral to the San Francisco City Attorney's Office for the above referenced site.

If you would like interpretation services at the Hearing, please inform the Inspector below at least 4 business days before the Hearing.
Si usted desea servicios de interpretación en la audiencia, por favor informe al inspector que aparece a continuación por lo menos 4 días hábiles antes de la audiencia.
如果您需要在聽證會上得到口譯/傳譯服務，請在聽證會之前至少4個工作日通知下列檢查員。
Kung gusto ninyo ng mga serbisyo ng interpretasyon sa Pagdinig, mangyaring ipagbigay-alam sa Inspektor na nakalista sa ibaba ng hindi bababa sa 4 araw ng negosyo bago ang Pagdinig.

Inspector/Investigator: Ivy Phan

Phone: (415) 252-3986 **Email:** ivy.phan@sfdph.org

Daniel Tsai
Director of Health



PROOF OF SERVICE

I, Ivy Phan, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the San Francisco Department of Public Health, Environmental Health Branch, 49 South Van Ness Avenue, Suite 600, San Francisco, CA 94103.

On October 28, 2025 I served the following document(s):

- Notice of Violation
- Notice of Hearing
- Director's Hearing Order
- SFDPH Hearing Brief
- Other: _____

on the following persons at the locations specified:

Richmond Serenity Spa
c/o Liyan Wang & Jing Huang
3446 Balboa St
San Francisco, CA 94121

emailed to: pvh831@gmail.com & richmondserenityspa@gmail.com

in the manner indicated below:

HAND DELIVERY: I handed the documents to the person whose name and signature are:

Recipient Name _____ Signature _____

BY U.S. POSTAL SERVICE

BY POSTING: I posted the document(s) in a conspicuous place on the building, structure or property

BY ELECTRONIC MAIL: Based on an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the electronic service address(es) listed above. Such document(s) were transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: ivy.phan@sfdph.org

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed October 28, 2025 at San Francisco, California.

Ivy Phan



MSG-25-03 DPH Briefings

From Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>

Date Thu 11/6/2025 5:58 PM

To Obana, Douglas (DPH) <douglas.obana@sfdph.org>; Santiago, Eurich (DPH) <eurich.santiago@sfdph.org>

Cc Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>; HANISH, BESS (CAT) <Bess.Hanish@sfcityatty.org>; Phan, Ivy (DPH) <ivy.phan@sfdph.org>

 2 attachments (271 KB)

Richmond_Official Information Privilege_Final.cleaned.pdf; Richmond_Vega Decl. ISO_Final.pdf;

Evening Doug and Eurich

Please see attached briefings for MSG-25-03.

Michelle Vega, REHS

Principal Environmental Health Inspector

Retail Tobacco, Massage, and Consumer Protection Program

Environmental Health Branch

Population Health Division

San Francisco Department of Public Health

49 South Van Ness, Suite 600

San Francisco, CA 94103

General: (415)252-3872

Direct: (415)252-3803

Email: Michelle.delacruz@sfdph.org

Web: www.sfdph.org/dph/eh



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1 DAVID CHIU, State Bar #189542
City Attorney
2 ANNE PEARSON, State Bar #201625
Chief Attorney, Health & Human Services
3 BESS IBTISAM HANISH State Bar # 325938
Deputy City Attorney
4 Fox Plaza
1390 Market Street, 5th Floor
5 San Francisco, California 94102-5408
Telephone: (415) 554-4229
6 Facsimile: (415) 554-4214
E-Mail: bess.hanish@sfcityatty.org
7

8 Attorneys
FOR THE CITY AND COUNTY OF SAN FRANCISCO
9

10 In the matter of:
11 RICHMOND SERENITY SPA.

ASSERTION OF OFFICIAL INFORMATION
PRIVILEGE

12
13
14 The City and County of San Francisco (the City) asserts the official information privilege
15 under California Evidence Code § 1040(b)(2) to withhold the physical appearance and identity of the
16 undercover agent whose investigation led to the initiation of this enforcement action against Richmond
17 Serenity Spa owned by Li Yan Wang and Jing Huang.
18

19 “Official information” refers to information acquired in confidence by a public employee in the
20 course of their duties, which has not been publicly disclosed prior to the assertion of privilege. Cal.
21 Evid. Code § 1040(a). Here, the official information sought to be withheld is the physical appearance
22 and identity of the undercover agent who investigated the practices at Richmond Serenity Spa. The
23 agent’s identity has remained confidential, and the City has taken deliberate measures to preserve that
24 confidentiality. *See Vera Decl.*
25

26 Under California Evidence Code § 1040(b)(2), a public entity may refuse to disclose official
27 information when “[d]isclosure of the information is against the public interest because there is a
28 necessity for preserving the confidentiality of the information that outweighs the necessity for

1 disclosure in the interest of justice.” The privilege applies where the public interest in confidentiality
2 clearly outweighs the need for disclosure, even where the information is central to the proceeding. *See*
3 *Ochoa v. Superior Ct.*, 199 Cal. App. 4th 1274, 1283 (2011).

4 Here, the public interest is best served by preserving the anonymity and physical appearance of
5 the agent in question. The agent is the sole operative assigned to conduct undercover investigations
6 into illicit activity at massage establishments within the City and County of San Francisco. The City’s
7 ability to enforce San Francisco Health Code Article 29 and its statutory scheme depends entirely on
8 this agent’s continued anonymity. Disclosure of the agent’s physical appearance and identity would
9 render the agent recognizable to the regulated community, compromising the integrity of ongoing and
10 future investigations.

12 The need for disclosure is minimal here at best. The City does not intend to call the agent to
13 testify live. Instead, the City intends to submit an incident report and declaration, which together
14 provide a sufficient evidentiary basis for an administrative action. Petitioners retain the opportunity to
15 challenge the substance and credibility of the agent’s account through the administrative process.

17 Protecting the agent’s physical identity does not in any way compromise Petitioners’ due
18 process interests. Because this is an administrative proceeding concerning only a property interest in a
19 permit, the Confrontation Clause does not apply and therefore Petitioners have no right to confront
20 witnesses in person. Nevertheless, the City is prepared to make the agent available for testimony
21 under protective conditions, such as appearing with video disabled during remote testimony.¹ This
22 would ensure that the petitioners have access to the substance of the allegations and a meaningful
23 opportunity to challenge the evidence without compromising the agent’s physical identity.

25
26 ¹ A closed hearing would be an insufficient remedy under these circumstances. Counsel for the
27 petitioners has historically represented other massage establishment(s) that have been investigation by
28 the City for illicit conduct. Disclosure of the agent’s identity, even in a closed setting, would likely be
shared among these clients, effectively disseminating the agent’s appearance across the regulated
industry. This would nullify the City’s enforcement capacity.

1 The City has met its burden in demonstrating the official information privilege applies. The
2 public interest in the City's ability to enforce its regulatory scheme—which exists to ensure that
3 massage parlors comply with environmental health standards, including prohibitions on sexual activity
4 and trafficking—far outweighs any asserted need for disclosure. The petitioners' due process rights
5 are fully protected through access to the agent's written statements and the opportunity to challenge
6 the evidence under protective conditions. Accordingly, the City respectfully requests that the hearing
7 officer sustain the City's assertion of the Official Information Privilege and preclude any disclosure or
8 inquiry into the agent's physical identity or appearance.
9

10
11
12 Dated: November 6, 2025

13 DAVID CHIU
14 City Attorney
15 ANNE PEARSON
16 Chief Attorney, Health & Human Services
17 BESS IBTISAM HANISH
18 Deputy City Attorney

19 By: Bess Ibtisam Hanish
20 BESS IBTISAM HANISH
21 Attorneys
22 FOR THE CITY AND COUNTY OF SAN FRANCISCO
23
24
25
26
27
28

1 DAVID CHIU, State Bar #189542
City Attorney
2 ANNE PEARSON, State Bar #201625
Chief Attorney, Health & Human Services
3 BESS IBTISAM HANISH State Bar # 325938
Deputy City Attorney
4 Fox Plaza
1390 Market Street, 5th Floor
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Telephone: (415) 554-4229
6 Facsimile: (415) 554-4214
E-Mail: bess.hanish@sfcityatty.org
7

8 Attorneys
FOR THE CITY AND COUNTY OF SAN FRANCISCO
9

10 In the matter of:
11 RICHMOND SERENITY SPA.

DECLARATION OF MICHELLE VEGA IN
SUPPORT OF THE CITY'S ASSERTION OF THE
OFFICIAL INFORMATION PRIVILEGE

14 I, Michelle Vega, declare as follows:

15
16 1. I am employed by the Environmental Health Branch (EHB) of the San Francisco
17 Department of Public Health and serve as Principal Environmental Health Inspector, Retail Tobacco,
18 Massage, and Consumer Protection Program.
19

20 2. In my official capacity, I have access to records and information generated or collected
21 by EHB in the course of its enforcement activities. The material at issue in this matter, specifically,
22 information that would reveal the physical appearance and identity of an undercover agent, has been
23 maintained as confidential at all times.

24 2. I have personally reviewed the material in question, including the agent's investigative
25 notes, declaration, and any associated documentation that could reveal the agent's physical identity.

26 3. The undercover agent whose identity is at issue is the sole operative assigned to
27 conduct covert investigations into illicit activity at massage establishments within the City and County
28 of San Francisco pursuant to San Francisco Health Code Article 29. Disclosure of the agent's physical

1 appearance would render him recognizable to the regulated community, thereby compromising the
2 integrity of ongoing and future investigations.

3 4. Even if disclosure were subject to a carefully crafted protective order, the risk of harm
4 remains substantial. Once the agent's physical appearance is disclosed, it cannot be undone.
5 Protective orders cannot fully eliminate the risk of inadvertent disclosure or misuse, nor can they
6 restore the agent's anonymity once compromised. Because the same legal counsel has historically
7 represented other massage establishments that have been under investigation, there is a significant
8 risk that the agent's identity could be shared with those clients, intentionally or not, undermining the
9 City's broader enforcement strategy.

10 5. Disclosure of the agent's identity would cause serious and lasting harm to the City's
11 enforcement efforts. The agent's ability to operate covertly would be irreparably impaired, and the
12 City's capacity to enforce San Francisco Health Code Article 29 would be significantly diminished.

13
14 I declare under penalty of perjury under the laws of the State of California that the foregoing is
15 true and correct and that this declaration was executed on November 6, 2025, in San Francisco,
16 California.

17
18 *Michelle Vega*
19 _____
20 MICHELLE VEGA
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In the matter of:

RICHMOND SERENTY SPA.

**DECLARATION OF SAN FRANCISCO
POLICE SERGEANT ROBERT GLENN**

1 I, Robert Glenn, declare as follows:

2 1. I am a Sergeant in the San Francisco Police Department (“SFPD”). I have been a peace
3 officer with the SFPD for more than 10 years. Prior to working at SFPD, I was an officer at the Ukiah
4 Police Department for almost 1 year and worked as an officer at the University of California – San
5 Francisco School of Law (formerly “UC – Hastings”) safety department of almost 5 years. I have
6 personal knowledge of the content of this declaration and if called to do so, would and could
7 competently testify to the truth of the matter stated.

8 2. I have been assigned to SFPD’s Special Victim’s Unit for the last year. I worked in
9 SFPDs Bayview, Ingleside, Central and Southern stations as a patrol officer prior to my current
10 assignment.

11 3. As a Sergeant at SFPD’s Special Victim’s Unit, I investigate crimes pertaining to
12 sexual assaults, domestic violence, child abuse, fraud among other crimes.

13 4. During the course of my career, I have interviewed thousands of victims, suspects,
14 and witnesses. I have also testified at preliminary hearings and jury trials. My training includes the
15 Basic P.O.S.T certification courses while attending the San Francisco Police Academy and on-
16 going instruction throughout my career in Advanced Officer Training courses. I have successfully
17 completed the following courses:

- 18 • 80 hour Robert Presley Institute of Criminal Investigation Basic Core Course
- 19 • 80 hour Police Officers Standards and Training (“POST”) Supervisory Course
- 20 • 24 hours plain clothes and undercover operations course
- 21 • 40 hour sexual assault investigations course

22 5. I am familiar with a business called the Richmond Serenity Spa (“Serenity Spa”). The
23 Serenity Spa is a commercial business occupying the ground floor of the 3448 Balboa St. San
24 Francisco, California. I have become familiar with the Serenity Spa based on investigations I have
25 personally conducted at the business and conversations with other SFPD officers who have conducted
26 their own investigations. I know the Serenity Spa to be an illegal brothel and a location where illegal
27

1 prostitution occurs. This is based on investigations I have personally conducted, conversations with
2 other officers, and a review of incident reports.

3 6. Based my investigation, I believe the Serenity Spa is owned by Jin Huang and Wang
4 Li.

5 7. On June 17, 2025, at approximately 4:00 p.m., I conducted an undercover operation at
6 the Serenity Spa. The goal of this operation was to see if there was illegal prostitution taking place.

7 8. I entered the Serenity Spa while wearing a mobile body bug and in possession of \$200
8 in marked City funds. I was greeted by an Asian female who escorted me to a back room. I did not see
9 any other people as I walked to the room, but was able to hear voices from other rooms. The voices
10 sounded as they were both male and female.

11 9. The room looked like a typical massage room, with a chair and massage table. There
12 was another table in the corner that had massage oils and a roll of toilet paper on top.

13 10. Once inside the room, the woman asked me “how long.” I told her I wanted a half hour
14 massage. The female said it would cost \$50. I gave the woman a \$100 bill. The woman told me she
15 would give me change.

16 11. The woman then pointed to the massage table. I asked whether I should take off my
17 clothes. The woman said, “take off,” pointed to a nearby chair and exited the room. I undressed, got
18 under a blanket covering the massage table and laid face down.

19 12. The woman returned to the room and put \$50 on the table. The woman then removed
20 the blanket covering me. She then began rubbing my shoulders and legs. She then began rubbing my
21 buttocks and then attempted to rub my perineum area, which I prevented by clenching my buttocks.

22 13. The woman then asked me to turn over, which I did. She then began rubbing my chest
23 and stomach. Eventually, she grabbed my penis and asked “you want” while making an up and down
24 motion with her other fist. I interpreted this gesture as an offer for manual stimulation.

25 14. I asked her how much. She said, “you tell me” and I offered \$60. The woman agreed
26 and went to the corner table to get oil. She then grabbed my penis and began manually stimulating me
27 with both hands.

Exhibit R

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EXHIBIT 2

From: [Vega, Michelle \(DPH\)](#)
To: [Paul](#)
Cc: [Phan, Ivy \(DPH\)](#); [Callewaert, Jennifer \(DPH\)](#); [Felipe, Albert \(DPH\)](#); [Lee, Danny \(DPH\)](#)
Subject: Re: 3446 Balboa Street - Case #MSG 25-03
Date: Tuesday, September 2, 2025 10:15:21 AM
Attachments: [image.png](#)

Sounds good. We will be issuing the Notice of Hearing shortly.

Michelle Vega, REHS

Principal Environmental Health Inspector
Retail Tobacco, Massage, and Consumer Protection Program
Environmental Health Branch
Population Health Division
San Francisco Department of Public Health
49 South Van Ness, Suite 600
San Francisco, CA 94103
General: (415)252-3872
Direct: (415)252-3803
Email: Michelle.delacruz@sfdph.org
Web: www.sfdph.org/dph/eh



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From: Paul <pvh831@gmail.com>
Sent: Tuesday, September 2, 2025 9:59 AM
To: Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>
Cc: Phan, Ivy (DPH) <ivy.phan@sfdph.org>; Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

Dear Michelle:

I intend to appropriately take this up with the Hearing Officer.

Paul

On Tue, Sep 2, 2025 at 9:51 AM Vega, Michelle (DPH) <michelle.delacruz@sfdph.org> wrote:

Morning Mr. Horcher,

The basis is simple. DPH discovered we have the authority to pursue revocation for the violation of SFHC 29.179(b) therefore the NOD was amended and issued accordingly. There are no new findings on this case.

Michelle Vega, REHS

Principal Environmental Health Inspector
Retail Tobacco, Massage, and Consumer Protection Program
Environmental Health Branch
Population Health Division
San Francisco Department of Public Health
49 South Van Ness, Suite 600
San Francisco, CA 94103
General: (415)252-3872
Direct: (415)252-3803
Email: Michelle.delacruz@sfdph.org
Web: www.sfdph.org/dph/eh



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From: Paul <pyh831@gmail.com>
Sent: Tuesday, September 2, 2025 9:22 AM
To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Cc: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>; Lee, Danny (DPH) <danny.lee@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

Dear Ivy:

Your reply was non-responsive.

I'll repeat my question.

The sudden penalty enhancement to revocation appears contrary to the facts and Code unless there has been a repeat violation triggering the permit revocation demand or the Director has suddenly found that such a higher penalty is necessary or appropriate to protect and promote the health and well-being of a Massage Business' employees, customers, and/or neighbors. **What is the basis of this finding, if any?**

Thank you,

Paul Horcher, Counsel for Li Yan Wang and Jing Huang, Richmond Serenity Spa

On Tue, Sep 2, 2025 at 9:12 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Good Morning Paul,

Under SFHC Section 29.45(12)(B), the permit penalty for anyone engaged in lewd conduct or performing sex acts as defined in Section 29.17(b) is revocation of the Massage Business permit.

Unlike other subsections in this code, the Director's discretion to impose enhanced penalties does not apply to this specific subsection. The revocation is not contingent on a repeat violation.



Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Paul <pyh831@gmail.com>
Sent: Wednesday, August 27, 2025 11:54 AM
To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Cc: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

Dear Ivy:

The sudden penalty enhancement to revocation appears contrary to the facts and Code unless there has been a repeat violation triggering the permit revocation demand or the Director has suddenly found that such a higher penalty is necessary or appropriate to protect and promote the health and well-being of a Massage Business' employees, customers, and/or neighbors. What is the basis of this finding?

Please respond.

Thank you,

Paul

On Wed, Aug 27, 2025 at 10:05 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:
Good Morning:

Please find the second amended Notice of Determination attached to this email. A hard copy will also be mailed out to the business and property owner(s). Once again, a Request for Hearing Form will not be sent out as we've already received the written request for hearing on 8/6/2025.

DPH acknowledges and grants your request for a continuance - we will be rescheduling this case to October 2025. The Notice of Hearing will be sent out at a later date.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Paul <pvh831@gmail.com>
Sent: Monday, August 25, 2025 4:19 PM
To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Cc: Callewaert, Jennifer (DPH) <jennifer.callewaert@sfdph.org>
Subject: Re: 3446 Balboa Street - Case #MSG 25-03

Dear Ivy:

With the new additional penalty demand of **60 days suspension** in addition to the \$7,500.00 in fines, the Amended NOD we just received is a material change and we will need additional time to prepare our defense; therefore I need to withdraw my availability for the September 18, 2025 Hearing date and request that the Hearing be accordingly scheduled for October 2025 at the earliest.

Thanks,

Paul

Atty for Liyan Wang and Jing Wang, 3446 Balboa St.

On Mon, Aug 25, 2025 at 9:14 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Thank you. The request for Mandarin interpretation has been made; we're still working on securing an interpreter at this time.

Regards,

Ivy Phan

Code Enforcement Investigator

San Francisco Department of Public Health

Population Health Division

Environmental Health Branch

49 South Van Ness Avenue, Suite 600

San Francisco, CA 94103

Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Paul <pvh831@gmail.com>

Sent: Monday, August 25, 2025 9:10 AM

To: Phan, Ivy (DPH) <ivy.phan@sfdph.org>

Subject: Re: 3446 Balboa Street - Case #MSG 25-03

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning, Ivy.

I intend to be there.

Please confirm Mandarin interpretation.

Thanks!

Paul

On Mon, Aug 25, 2025 at 9:06 AM Phan, Ivy (DPH) <ivy.phan@sfdph.org> wrote:

Hello:

Please confirm availability for the scheduled hearing date.

Regards,

Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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From: Phan, Ivy (DPH) <ivy.phan@sfdph.org>
Sent: Wednesday, August 20, 2025 10:10 AM
To: Serenity Spa <richmondserenityspa@gmail.com>
Cc: Paul <pvh831@gmail.com>; Vega, Michelle (DPH) <michelle.delacruz@sfdph.org>;
Lee, Danny (DPH) <danny.lee@sfdph.org>; Felipe, Albert (DPH) <albert.felipe@sfdph.org>
Subject: 3446 Balboa Street - Case #MSG 25-03

Good Morning,

Please find the Notice of Hearing for your upcoming Director's Hearing case attached. A hard copy will also be mailed out to the establishment.

Regards,
Ivy Phan
Code Enforcement Investigator
San Francisco Department of Public Health
Population Health Division
Environmental Health Branch
49 South Van Ness Avenue, Suite 600
San Francisco, CA 94103
Tel: (415) 252-3986

Please note that my work schedule is Monday-Thursdays, off Fridays.

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PUBLIC COMMENT

From: [Claire F](#)
To: [BoardofAppeals \(PAB\)](#)
Subject: Appeal No. 25-059, 3446 Balboa Street
Date: Sunday, February 22, 2026 5:00:23 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

I am writing to support the revocation of the massage permit 120465 for 3446 Balboa Street. I am fully against their efforts to appeal this massage permit. I want them shut down and gone.

I have lived in the Outer Richmond since 2008, and lived next door to (and now across the street from) Richmond Serenity Spa since 2019.

In that time, I have observed the following:

- Don't be fooled by the online reviews - only men, and the women who work there, go in and out of the establishment;
- Their customers (men) frequently block our driveway, and they make no efforts to warn their customers against doing so. When we have asked their customers to move, the customers are often belligerent and one escalated with us calling the police as a customer became violent;
- When I researched the place, I found they were listed on Rubmaps, a listing for erotic massage parlors. A screenshot from today shows reviews dated 2024. I have also included a screenshot of a listing of theirs on HarlotHub (URL 5escorts), which I found today, and here's a link to another listing of erotic massage parlors (<https://www.findtheseven.com/listings/2325>);
- Their business website "Meet the Team" is clearly bogus (see screenshot, taken today);
- Nearby business owners and neighbors talk all the time about how Richmond Serenity Spa is under investigation by federal authorities for human trafficking. I was home when it was raided by the police in its old location (3443 Balboa). I thought something was finally happening to them, and I was upset and disappointed that they were able to move their operation across the street. It is the same operation, and it is wild to know this has been happening for years and years, and with children living in surrounding buildings (and an elementary school around the corner).
- They are still open today - right now - with what is apparently a suspended massage license. What gives?

While I support women making a living however they need to (as long as it doesn't hurt anyone, and involves consenting adults), to have an establishment potentially engaged in human trafficking is unacceptable. I am guessing their appeal is based on an argument that the location listed on the various erotic massage sites is closed and was owned by someone else, but people in the neighborhood know it's the same owners and same people who are operating at 3446 Balboa Street. The font on their awning is the same, for goodness sake. Why would new owners want to associate with an entity that has a poor reputation? Do the right thing and shut it down, please.

Claire Fedewa

4:23

47%



5escorts.com/newsite/san-f

2



HarlotHub

Post Ad

Home » San Francisco » Erotic Massage »
Richmond Serenity Spa

Richmond Serenity Spa - (25)

102

Whatsapp

Message

Phone





4:18

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Anna Herman

MARKETING DIRECTOR

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sed diam nonummy nibh



Richmond Serenity Spa

Distance to this massage parlor center: 47.4 mi



111 reviews

LEAVE A REVIEW

ADD TO FAVORITES

Masseuse Ethnicity:

Asian	Sauna: No
Email: richmondserenityspa@gmail.com	Jacuzzi: No
Website: richmondserenityspa.com	Semi-Truck Parking: No
Cards Accepted: Visa, Mastercard	30 min: \$40
	45 min: \$50
	60 min: \$60

Address:
3443 Balboa Street
San Francisco, California 94121

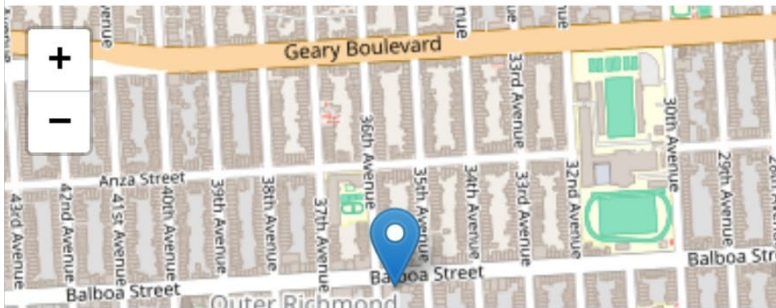
Major Streets:
35th and 36th

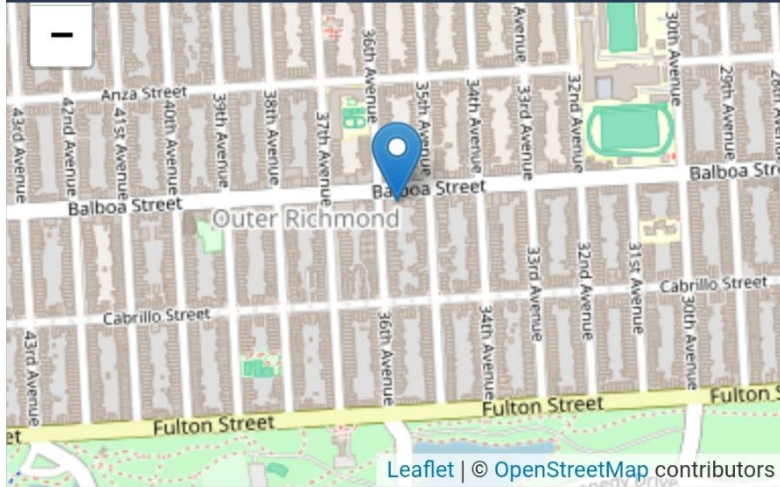
[Get Driving Directions](#)

Phone Number:
415-702-6468

REPORT

Hours:
Daily 11:00am - 8:00pm





MP reviews (111)

Comments (7)

Order: Review Date ▾

1 2 3 4

- N** kinkyconfirmed
- Vicky 03.26 2024 7
- N** BeneathHowlingStars
- Vicky 02.27 2024 5
- N** uselesshit
- Vicky 02.01 2024
- N** CLAYiddler57
- Vicky 01.11 2024
- N** Eloiner
- Vicky 12.26 2023 3
- N** fierywielder666
- Vicky 11.22 2023 5



SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH
DIRECTOR HEARING
PUBLIC COMMENT FORM

To provide

testimony or comment at the Director's Hearing, please print your name, your business or organization name, and specify the address that you wish to speak about.

NAME:

OR

ORGANIZATION: (Please print)

OR

ORGANIZATION:

(If applicable)

CASE:

ADDRESS:

(Please include the address of the case that you wish to speak about)

*Special

requesters have the right to remain anonymous.

Please

return this form to any Director Hearing Administrator(s).

COMMENT:

3446 Balboa St.

We are writing as concerned neighbors to express ongoing unease regarding activity at Richmond Serenity Spa.

Over the past couple of years, members of the community have observed men frequently entering and exiting the premises. It has also been observed that individuals sometimes come and go after typical business hours. This pattern of activity has been concerning to nearby residents and business owners.

There has also been at least one incident involving a parking dispute that escalated into aggressive and unsafe behavior involving a male customer and his vehicle, which was alarming to those nearby.

This situation is particularly concerning given the family-oriented nature of our neighborhood. Many families with young children live nearby, and activity that appears irregular or disruptive contributes to a sense of discomfort within our community.

Our primary concern is the safety and well-being of neighborhood residents. We respectfully request that the appropriate authorities review our concerns and react accordingly.

We appreciate your attention to this matter and hope appropriate steps will be taken to help create a safe and peaceful environment for the residents in our community.

- Outer Richmond Resident and Business Owner

SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH
DIRECTOR HEARING
PUBLIC COMMENT FORM

To provide

testimony or comment at the Director's Hearing, please print your name, your business or organization name, and specify the address that you wish to speak about.

NAME:

ME:

(Optional*) (Please print)

OR

ORGANIZATION:

(If applicable)

CASE

ADDRESS:

(Please include the address of the case that you wish to speak about)

*Speakers

have the right to remain anonymous.

Please

return this form to any Director Hearing Administrator(s).

COMMENT:

N/A

Appeal no. 25-059 at 3446 Balboa Street

Dear Judge, We are a business owner located near Richmond Serenity Spa and have been aware of ongoing illicit activity at this establishment for several years. This situation is a serious concern for our community, and we respectfully request that you take appropriate action, revoking their ability to operate. Our community deserves to feel safe and protected.

Thank you for your time and consideration.

SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH
DIRECTOR HEARING
PUBLIC COMMENT FORM

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o provide testimony or comment at the Director's Hearing, please print your name, your business or organization name, and specify the address that you wish to speak about.

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ASE ADDRESS:

(Please include the address of the case that you wish to speak about)

*S

peakers have the right to remain anonymous.

P

lease return this form to any Director Hearing Administrator(s).

COMMENT:

Anonymous

3446 Balboa Street (Richmond Serenity Spa)

As a neighboring business, we received the letter announcing the hearing for appeal no. 25-059 at 3446 Balboa Street, and were surprised that a license revocation has taken this long. The activity at this spa is blatant and widely known throughout the community - it is a nuisance.

Please do the right thing for our neighborhood and revoke the massage establishment permit for Richmond Serenity Spa. Enough is enough.

SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH
DIRECTOR HEARING
PUBLIC COMMENT FORM

To provide testimony or comment at the Director's Hearing, please print your name, your business or organization name, and specify the address that you wish to speak about.

Name: Anonymous

(Optional*)

Organization: Anonymous

(If applicable)

Case Address: Richmond Serenity Spa located at 3446 Balboa Street

*Speakers have the right to remain anonymous.

Please return this form to any Director Hearing Administrator(s).

COMMENT:

We are a group of concerned neighbors writing to express our strong opposition to the continued operation of Richmond Serenity Spa at 3446 Balboa Street. This is a family-oriented block with Lafayette Elementary School, Little Sprouts Academy, the YMCA, and multiple youth programs all within steps of the business. The street also regularly hosts festivals and community events, drawing families and children to the area. It is unsuitable and unsafe for an illegal business of this nature to operate in the middle of a residential and community-centered neighborhood.

For years, residents have observed the spa operate as a revolving door for men, seven days a week. Streams of men come and go - never women, aside from the female workers. This illegal activity is neither hidden nor subtle; it is impossible for neighbors to ignore. Multiple community members have raised concerns to the Special Victims Unit, the Police Department, and the Department of Public Health over the years, given how blatant the operations are. Despite these complaints, the establishment has continued to take advantage of the system while disregarding the repeated concerns of those who live here. All businesses and individuals are expected to abide by the laws of San Francisco, and the City of San Francisco and its Judges have a responsibility to protect residents from those who blatantly disregard these laws for personal gain.

This operation is wholly unsuitable for the community. It has created disruption and instability for years, and it has no place in a neighborhood built around schools, families, and community programs.

The presence of an illegal business in this location undermines the sense of safety and cohesion that residents rely on. Living near such activity is destabilizing and unsafe for families who simply want to feel secure in their homes and neighborhood. Businesses engaged in this type of unlawful activity also pose a broader risk to the community around them. We strongly urge the City to take immediate and decisive action to close this establishment once and for all.

Respectfully submitted,

Concerned Neighbors of Balboa Street