

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Domenico R. Lonardo,
Licensed Massage Therapist
Nevada License No. NVMT.11397,
Respondent.

Case No. NVMT-C-23095

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies Domenico R. Lonardo ("Respondent") of an administrative hearing, which is to be held pursuant to Chapters 233B, 622, 622A of the Nevada Revised Statutes (NRS) and 640C of the Nevada Revised Statutes (NRS) and the Nevada Administrative Code (NAC). The purpose of the hearing is to consider the allegations stated below and to determine if the Respondent should be subject to an administrative penalty as set forth in NRS 640C.710, if the stated allegations are proven at the hearing by the evidence presented.

Respondent is currently and at all times mentioned herein, licensed as a massage therapist in the State of Nevada and is therefore, subject to the jurisdiction of the Board and the provisions of NRS Chapter 640C.

IT IS HEREBY ALLEGED AND CHARGED AS FOLLOWS:

ALLEGED FACTS

1. L.F. is employed at the Clark County School District.
2. Respondent has a probationary license.
3. Respondent met L.F. during teacher appreciation week when she received a business card from Respondent for his outcall business.
4. Subsequently, L.F. paid for three massages to be performed at her home for one hundred sixty dollars (\$160.00).
5. The first two massages were performed in L.F.'s home, in the living room, with her fiancé present.
6. On or about November 15, 2023, the third massage was performed in L.F.'s home, in the living room, while her fiancé was in the bedroom caring for their baby.

1 7. During the course of the third massage, Respondent cupped and fondled L.F.'s breasts and
2 flicked her nipple, then kissed her forehead upon completing the massage.

3
4 **VIOLATIONS OF LAW**

5 **COUNT ONE**

6 8. By cupping and fondling L.F.'s breasts during the course of a massage, Respondent violated
7 the provisions of NRS 640C.700(4) and/or (9). This is grounds for discipline pursuant to
8 NRS 640C.700(2).

9 **COUNT TWO**

10 9. By kissing L.F.'s forehead, Respondent violated the provisions of NRS 640C.700(4) and/or
11 (9). This is grounds for discipline pursuant to NRS 640C.700(2).

12 **PRAYER FOR RELIEF**

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

14 10. That the Board conduct a hearing on this complaint as provided by statute, and after such
15 hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710,
16 which may include the following, (a) the imposition of an administrative fine of not more than
17 \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs incurred, (c)
18 recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e)
19 suspend, revoke or place conditions on the licensee's license, (f) place the licensee on
20 probation, and/or (g) such other impositions as may be permitted by Nevada law.

21
22 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
23 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
24 622, 622A and 640C of the Nevada Revised Statutes.

25 THE HEARING WILL TAKE PLACE on Wednesday, **March 20, 2024, commencing at 9:00**
26 **a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom or
27 by appearing in person.

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

COPY

1 <https://us06web.zoom.us/j/83570986231?pwd=zJv2aY3VR2oVwCdhbnsqZ74rimro5w.1>

2 Meeting ID: 835 7098 6231

3 Password: 201609

4 Dial by your location

5 +1 253 215 8782 US (Tacoma)

6 +1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

7 +1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

8 +1 929 205 6099 US (New York)

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

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

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

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

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

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

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

1 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
2 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
3 contacting Elisabeth Barnard, (775) 687-9951 or ebarnard@lmt.nv.gov.

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

8 Dated this 22nd day of February, 2024.

9 **NEVADA STATE BOARD OF MASSAGE THERAPY**

10 
11 ELISABETH BARNARD, Executive Director

12 **CERTIFICATE OF SERVICE**

13 I HEREBY CERTIFY that on February 23, 2024, I deposited for mailing at Reno, Nevada, via
14 Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing
15 **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
16

17
18 Domenico R. Lonardo
19 PO BOX 95182
20 Las Vegas, NV 89193

9489 0090 0027 6449 4515 15

21 **NEVADA STATE BOARD OF MASSAGE THERAPY**

22 
Employee

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27
28 **COPY**