

BEFORE THE NEVADA STATE BOARD OF  
MASSAGE THERAPY

In the Matter of:

Jeffrey DeGiovanni,

Licensed Massage Therapist  
Nevada License No. NVMT.7866,

Respondent.

Case No. NVMT-C-1965

**COMPLAINT AND  
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Jeffrey DeGiovanni ("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 Respondents 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.e In or about May 2016, Respondent massaged MR at her house, wherein Respondent attempted to kiss MR without her consent.e
- 2.e In or about June 2016, Respondent massaged MR at her house, wherein Respondent attempted to kiss MR, pull the sheets down and attempted to massage MR's breasts without her consente
- 3.e In total, Respondent massaged MR on four different occasions wherein Respondent acted inappropriately.e

1 **VIOLATIONS OF LAW**

2 **COUNT ONE**

- 3 1. By engaging in or soliciting sexual activity during the course of practicing massage with  
4 MR, Respondent violated the provisions of NRS 640C.700(4), NRS 640C.700(2), and/or  
5 NRS 640C.700(9).

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Executive Director, Sandra Anderson, prays as follows:

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

16  
17 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this  
18 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,  
19 622, 622A and 640C of the Nevada Revised Statutes.

20 Pursuant to Governor Steve Sisolak’s Emergency Directive 006, there will be  
21 no physical location for this meeting. Participants can join the meeting via Zoom.

22 **THE HEARING WILL TAKE PLACE:**

23 **Wednesday, August 19, 2020, commencing at 9:00 a.m.**

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

25 Register in advance for this meeting:

26 <https://zoom.us/j/98844482882?pwd=YnVWeHBaMEtWZWFnZmdJRXRwYlpcQT09>

27 After registering, you will receive a confirmation email containing  
28 information about joining the meeting.

Meeting ID 988-4448-2882

Password 246012

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

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

4 As the Respondent, you are specifically informed that you have the right to appear and be heard  
5 in your defense, either personally or through counsel of your choice. You have the right to respond  
6 and to present relevant evidence and argument on all issues involved. You have the right to call and  
7 examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant  
8 to the issues involved.

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

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

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

19 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,  
20 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by  
21 contacting Sandra Anderson, (775) 687-9951 or sjanderson@lmt.nv.gov.



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

26 Dated this 4th day of August, 2020.

27 **NEVADA STATE BOARD OF MASSAGE THERAPY**

28   
SANDRA ANDERSON, Executive Director



<p><b>Nevada State Board of Massage Therapy</b>  <b>1755 E Plumb Ln Ste 252 Reno, NV 895023656</b></p>	<p>Brought to you by:  <b>Reno/Carson Messenger Service Inc</b></p>  <p><b>(775) 322-2424</b>  <b>Server: JENLEE KNIGHT PARKER</b></p>
<p>GPS: 39.5225444444444;-119.808075</p> 	<p>CASE NUMBER: <b>NVMT-C-1965</b></p>
<p><b>SUMMARY OF SERVICE</b></p>	<p>Reference No.: <b>NVMT-C-1965</b>      <b>JOB COMPLETE</b>  <b>R105078</b></p>

DOCUMENTS SERVED: COMPLAINT AND NOTICE OF HEARING;;

PARTY SERVED: Quade Law, LTD.

BY LEAVING WITH: Paul Quade , Person-In-Charge

PHYSICAL DESCRIPTION: Age: 56-60      Weight: 161-180 Lbs      Hair: Gray /White  
 Sex: Male      Height: 5'7 - 6'0      Race: Caucasian

DATE & TIME OF SERVICE: 8/5/2020  
 12:15 PM

ADDRESS, CITY, AND STATE: 216 E Liberty St  
 Reno, NV 895012211

COMPLETED BY      **JENLEE KNIGHT PARKER** reg#: R-2018-000296

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**SUMMARY OF SERVICE**

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**NVMT-C-1965**

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