



BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Tiavera Robinson,

Licensed Massage Therapist
Nevada License No. NVMT.9887,

Respondent.

Case No. NVMT-R-2123

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Tiavera Robinson (“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. On or about March 27, 2019, Respondent appeared before the Board for regarding her license application that by Board policy, could not be administratively approved.
2. The Board approved a five-year probationary license that included:
 - a. No outcall services;
 - b. Her employer must “provide monthly reports to Board staff;”
 - c. That she submit to annual background checks at her own expense; and
 - d. That she cooperate with Board staff during probation.
3. As of today, Respondent:
 - a. Has not submitted to a background check;
 - b. Has an eighty-five Dollar (\$85.00) outstanding balance due to the Board;

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- 1 c. Has not cooperated with Board staff; and
2 d. Has changed employers or left employment without informing Board staff.
3 4. Board staff has not received employer reports.
4 5. Respondent's license expired on April 30, 2021, and has not renewed.

5 **VIOLATIONS OF LAW**

6 **COUNT ONE**

- 7 6. By engaging in the activities alleged above, Respondent has not complied with the terms
8 of her probation, and therefore, Respondent violated the provision of NRS 640C.700(13)
9 and/or (9). This is grounds for discipline pursuant to NRS 640C.700(2).

10 **COUNT TWO**

- 11 7. By failing to respond to the Board's request for information within 60 days, Respondent
12 violated the provision of NRS 640C.700(8) and/or (9). This is grounds for discipline
13 pursuant to NRS 640C.700(2).

14 **PRAYER FOR RELIEF**

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

- 16 8. That the Board conduct a hearing on this complaint as provided by statute, and after such
17 hearing, that the Board impose upon Respondent the discipline permitted by NRS
18 640C.710, which may include the following, (a) the imposition of an administrative fine of
19 not more than \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs
20 incurred, (c) recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly
21 reprimanded, (e) suspend, revoke or place conditions on the licensee's license, (f) place the
22 licensee on probation, and/or (g) such other impositions as may be permitted by Nevada law.
23

24 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
25 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
26 622, 622A and 640C of the Nevada Revised Statutes.

27 THE HEARING WILL TAKE PLACE on **Tuesday, August 17, 2021, commencing at 9:00**
28 **a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom.

1 Zoom sign-in available at 8:30 a.m.
2 Register in advance for this meeting:

3 <https://us06web.zoom.us/j/96813878335?pwd=cHAXM3NkY2gvWTVZaWpTRE5BNn10UT09>

4 Meeting ID: 968 1387 8335
5 Password: 819714

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

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

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

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

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

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

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

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

Dated this 19 day of July, 2021.

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2 **NEVADA STATE BOARD OF MASSAGE THERAPY**

3 *Sandra Anderson, for*
4 SANDRA ANDERSON, Executive Director

5 **CERTIFICATE OF SERVICE**

6 I HEREBY CERTIFY that on July, 19, 2021, I deposited for mailing at Reno, Nevada, via
7 Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing
8 **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
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11 Tiavera Robinson
12 5939 Trickling Descent St. Unit 101
13 Henderson, NV 89011

14 NEVADA STATE BOARD OF MASSAGE THERAPY

15 *Sandra Anderson*
16 Employee

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