



BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Seanna M. Cornelius,

Licensed Massage Therapist
Nevada License No. NVMT.2565,

Respondent.

Case No. NVMT-C-21012

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Seanna M. Cornelius (“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. From the period of January 10, 2020 to December 7, 2020, Mr. Miles paid Respondent a total of approximately eleven thousand seven hundred and ninety-five Dollars (\$11,795.00) for massage therapy services.
2. Respondent allegedly charges one thousand two hundred Dollars (\$1,200.00) for 10 two-hour massage therapy sessions.
3. Respondent performed these massages from her home.
4. Respondent allegedly performed less than 15 massages; thus, Mr. Miles paid for 75 massages that were never performed.
5. Respondent’s business license expired on January 31, 2019.
6. Respondent’s massage therapy license expired on September 30, 2020.

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1 **VIOLATIONS OF LAW**

2 **COUNT ONE**

3 7. By receiving compensation for massage therapy services Respondent failed to provide,
4 Respondent violated the provisions of NRS 640C.700(9) and/or NRS 640C.700(12). This
5 is grounds for discipline pursuant to NRS 640C.700(2).

6 **COUNT TWO**

7 8. By performing massage therapy services with an expired license, Respondent violated the
8 provisions of NRS 640C.910(2)(a) and/or NRS 640C.700(9). This is grounds for discipline
9 pursuant to NRS 640C.700(2).

10 **PRAYER FOR RELIEF**

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

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

19
20 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
21 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
22 622, 622A and 640C of the Nevada Revised Statutes.

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

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

27 <https://us06web.zoom.us/j/96813878335?pwd=CHAxM3NkY2gvWTZaWpTRE5BNn10UT09>

28 Meeting ID: 968 1387 8335

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1 Password: 819714

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

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

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

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

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

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

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

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

27 Dated this 19 day of July, 2021.

28 **NEVADA STATE BOARD OF MASSAGE THERAPY**



SANDRA ANDERSON, Executive Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 19, 2021, I deposited for mailing at Reno, Nevada, via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

Seanna M. Cornelius
18375 Narrowleaf Ct.
Reno, NV 89508

NEVADA STATE BOARD OF MASSAGE THERAPY


Employee

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