



1 **COUNT TWO**

2 3. By attempting sexual activity on female client during the course of practicing massage  
3 Respondent violated the provisions of NRS 640C.700(4) and/or (9). This is grounds for  
4 discipline pursuant to NRS 640C.700(2).

5 **COUNT THREE**

6 4. By improperly draping female client during the course of practicing massage, Respondent  
7 violated the provisions of NRS 640C.700(9) and/or NAC 640C.340. This is grounds for  
8 discipline pursuant to NRS 640C.700(2).

9 **PRAYER FOR RELIEF**

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

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

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

22 THE HEARING WILL TAKE PLACE on **Wednesday, January 12, 2022, commencing a**  
23 **9:00 a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom

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

26 <https://us06web.zoom.us/j/86981107368?pwd=cVhxOFhuVGRNOTV3clhvTnRPOUZKdz09>

27 Meeting ID: 869 8110 7368  
28 Password: 627930

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

26 Dated this 21st day of November, 2021.

27 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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SANDRA ANDERSON, Executive Director

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December \_\_\_\_, 2021, I personally served Michael W. Jackson, a true and correct copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

Michael W. Jackson  
3929 Woodhill Ave.  
Las Vegas, NV 89121

Service provider for the NEVADA STATE BOARD OF MASSAGE THERAPY

Signature

**Reno Carson Messenger Service, Inc.**  
**185 Martin Street**  
**Reno, NV 89509**

Nevada State Board of Massage Therapy  
1755 E Plumb Ln Ste 252 Reno, NV 895023656

Brought to you by:

**Reno/Carson Messenger Service Inc**



(775) 322-2424

Server: AMANDA POWELL

GPS: 36.1128336;-115.0882454

CASE NUMBER: NVMT-C-21079

**SUMMARY OF SERVICE**

Reference No.:  
NVMT-C-21079

**JOB COMPLETE**  
R131406

DOCUMENTS SERVED: COMPLAINT AND NOTICE OF HEARING;;

PARTY SERVED: Michael W. Jackson

BY LEAVING WITH: John Doe , Roommate

PHYSICAL DESCRIPTION: Age: 46 - 50      Weight: 221-240 Lbs      Hair: Gray/White  
Sex: Male      Height: 5'7 - 6'0      Race: Caucasian

DATE & TIME OF SERVICE: 12/23/2021  
6:45 PM

ADDRESS, CITY, AND STATE: 3929 Woodhill Ave  
Las Vegas, NV 891216252

**COMPLETED BY**      **AMANDA POWELL**      reg#: R-2019-11004

Server Report: Individual confirmed residency of himself and Subject. Individual initially refused documents, however later stated that he will leave documents on dining table for Subject.

**THIS IS NOT A LEGAL DOCUMENT, DO NOT ATTEMPT TO FILE IT WITH THE COURT.**

**SUMMARY OF SERVICE**  
**NVMT-C-21079**

1  
2 **IN THE BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY**  
3 **IN AND FOR THE COUNTY OF CARSON CITY**

4 **In the Matter of Michael W. Jackson, Licensed**  
5 **Massage Therapist Nevada License No. NBMT. 4748,**

6 Plaintiff(s),

CASE NO: NVMT-C-21079

7 VS.

8 Defendant(s),

9  
10 **DECLARATION OF SERVICE**

11 ss.:

12 **AMANDA POWELL**, being duly sworn says: That at all times herein Affiant was and is a citizen of the United States, over 18 years of age, and not a party to nor interested in the proceedings in which this Affidavit is made.

13 That Affiant received copy(ies) of the **COMPLAINT AND NOTICE OF HEARING**; On 12/23/2021 and served the same on 12/23/2021 at 6:45 PM by delivery and leaving a copy with:

14 **2. John Doe - Roommate** a person of suitable age and discretion residing at Michael W. Jackson's usual place of a a abode.aa

15 Served on behalf of Michael W. Jackson, at Michael W. Jackson's place of residence.

16 Service Address: 3929 Woodhill Ave, Las Vegas, NV 89121-6252

17 **A description of John Doe is as follows**

Gender	Color of Skin/Race	Hair	Age	Height	Weight
Male	Caucasian	Gray/White	46 - 50	5'7 - 6'0	221-240 Lbsaa
Other Features: Long white/brown beard					

18 Server Report: Individual confirmed residency of himself and Subject, individual initially refused documents, however later stated that he will leave documents on dining table for Subject.

19 Pursuant to NRS 239B.030 this document does not contain the social security number of any person.

20 Affiant does hereby affirm under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

21 STATE OF NEVADA  
22 COUNTY OF Clark

23 Executed on: 12/27/2021  
24 by AMANDA POWELL  
25 Registration: R-2019-11004

26 No notary is required per NRS 53.045

X

  
AMANDA POWELL  
Registration: R-2019-11004  
Reno Carson Messenger Service, Inc #211  
185 Martin St.  
Reno, NV 89509  
(775) 822-2424aa  
www.renocarson.comaa

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28 \*.R131406\*



Order#: R131406 NVPRF411

