

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Joanna M. Iris,

Licensed Massage Therapist
Nevada License No. NVMT.10460,

Respondent.

Case No. NVMT-P-2131

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director Sandra Anderson, hereby notifies Joanna M. Iris (“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.e On or about July 1, 2020, Respondent appeared before the Board for regarding her license application that by Board policy, could not be administratively approved.
- 2.e The Board approved a two-year probationary license that included:
 - a.e That she submits to a background check within one year of the date of the Order and within two years of the date of the Order at her own expense;
 - b.e That her employer provide quarterly reports to the Executive Director; and
 - c.e That she cooperates with Board staff during probation.
- 3.e On or about July 13, 2020, Respondent attended probation orientation.
- 4.e On or about April 20, 2021, Board staff sent Respondent a letter requesting her background check and an invoice was included; Board staff received no response.

1 5.e On or about July 20, 2021, Board staff send Respondent a follow up letter requesting her
2 background check and an invoice was included; Board staff received no response.e

3 6.e As of today, Respondent:e

4 a.e Has not submitted a background check;e

5 b.e Has not paid for the costs associated with a background check;e

6 c.e Has not provided any quarterly reports from her employer; ande

7 d.e Has not cooperated with Board staff.e

8 **VIOLATIONS OF LAW**

9 **COUNT ONE**

10 7.e By not providing a timely background check, Respondent has not complied with the terms
11 of her probation, and therefore, Respondent violated the provision of NRS 640C.700(13)
and/or (9). This is grounds for discipline pursuant to NRS 640C.700(2).e

12 **COUNT TWO**

13 8.e By not providing payment for the cost associated with the background check, Respondent
14 has not complied with the terms of her probation, and therefore, Respondent violated the
15 provision of NRS 640C.700(13) and/or (9). This is grounds for discipline pursuant to NRS
640C.700(2).e

16 **COUNT THREE**

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

20 **PRAYER FOR RELIEF**

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

22 10. That the Board conduct a hearing on this complaint as provided by statute, and after such
23 hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710,
24 which may include the following, (a) the imposition of an administrative fine of not more than
25 \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs incurred, (c)
26 recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e)
27 suspend, revoke or place conditions on the licensee's license, (f) place the licensee o
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1 probation, and/or (g) such other impositions as may be permitted by Nevada law.

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3 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider thi
4 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B
5 622, 622A and 640C of the Nevada Revised Statutes.

6 THE HEARING WILL TAKE PLACE on **Wednesday, January 12, 2022, commencing a**
7 **9:00 a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom.

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

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

11 Meeting ID: 869 8110 7368

12 Password: 627930

13 PURSUANT TO NRS 622A.320, Respondent may, but is not required to, file an answer to thi
14 Complaint with the Board.

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

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

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

24 The purpose of the hearing is to determine if the Respondent has violated the provisions o
25 Chapter 640C of NRS and if the allegations contained herein are substantially proven by the evidenc
26 presented to further determine what administrative penalty is to be assessed against the Respondent, i
27 any, pursuant to NRS 640C.710.

28 Should the Respondent fail to appear at the hearing, a decision may still be reached by th
Board. As the Respondent, you are further advised that you may be charged with the attorney's fee
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 Sandra Anderson, (775) 687-9951 or sjanderson@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 9 day of December, 2021.a

9 **NEVADA STATE BOARD OF MASSAGE THERAPY**

10 
11 SANDRA ANDERSON, Executive Director

12
13 **CERTIFICATE OF SERVICE**

14 I HEREBY CERTIFY that on December 9, 2021, I deposited for mailing at Reno, Nevada, via
15 Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing
16 **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
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19 Joanna M. Iris
20 13550 NE Village Square Drive Unit H402
21 Woodinville, WA 98072

22 NEVADA STATE BOARD OF MASSAGE THERAPY

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24 Employee

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