## BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY

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4 Sasha I. Wheelock,

In the Matter of:

Licensed Massage Therapist Nevada License No. NVMT.5878,

Respondent.

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Case No. NVMT-C-2212

COMPLAINT AND NOTICE OF HEARING

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Sasha I. Wheelock ("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

- On or about February 10, 2022, Respondent submitted a renewal application. Respondent indicated that she was arrested for Domestic Violence on July 5, 2021, wherein she was to complete anger management classes.
- 2. On or about February 22, 2022, the Board approved Respondent's renewal application.
- 3. On or about March 8, 2022, the Board sent Respondent a request for information regarding her arrest and court case; as of today, Respondent has failed to respond.
- 4. Justice court documents in case number 21-CR-031845 show that on or about July 13, 2021, Respondent pled nolo to Domestic Violence (misdemeanor) and was ordered to complete anger management counseling and pay a fine, among other requirements.

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#### **VIOLATIONS OF LAW**

#### COUNT ONE

5. By failing to respond to the Board's request for information within sixty (60) days. Respondent violated NRS 640C.700(8) and/or (9). This is grounds for discipline pursuant to NRS 640C.700(2).

#### **COUNT TWO**

6. By being convicted of a crime involving violence, Respondent violated NRS 640C.700(3) and/or (9). This is grounds for discipline pursuant to NRS 640C.700(2).

#### PRAYER FOR RELIEF

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

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

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

THE HEARING WILL TAKE PLACE on Wednesday, August 10, 2022, commencing at 9:00 a.m. or as soon thereafter as the Board is able to hear the matter with video conferencing by Zoom.

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

Register in advance:

https://us06web.zoom.us/j/82173853899?pwd=K3dVNDh1Y09jYnBJZ3oxQkFTSkdtUT09

Meeting ID: 821 7385 3899 Password: 788395

Dial by your location +1 253 215 8782 US (Tacoma) +1 346 248 7799 US (Houston) .

+1 669 900 6833 US (San Jose) +1 301 715 8592 US (Washington DC) +1 312 626 6799 US (Chicago) +1 929 205 6099 US (New York) Meeting ID: 821 7385 3899 Passcode: 788395

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

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

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

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

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

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

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

Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may, without 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 // day of // , 2022

### NEVADA STATE BOARD OF MASSAGE THERAPY 1. SANDRA ANDERSON, Executive Director I HEREBY CERTIFY that on July \_\_\_\_, 2022, I personally served Sasha I. Wheelock, a true and correct copy of the foregoing COMPLAINT AND NOTICE OF HEARING, properly addressed as follows: Sasha I. Wheelock 3920 Badura Avenue Las Vegas, NV 89118 Service provider for the NEVADA STATE BOARD OF MASSAGE THERAPY Signature Reno Carson Messenger Service, Inc. 185 Martin Street Reno, NV 89509

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2	IN THE BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY IN AND FOR THE COUNTY OF CARSON CITY
3	In the Matter of Sasha I. Wheelcok,
4	Plaintiff(s),  VS. CASE NO: NVMT-C2212
	VS.
5	Defendant(s),
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,	DECLARATION OF SERVICE
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9	SS.:
10	JOHN WHITE, 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.
11	That Affiant received copy(ies) of the COMPLAINT AND NOTICE OF HEARING; On 7/15/2022 and served the same o
12	7/16/2022 at 10:44 AM by delivery and leaving a copy with:
	2. Julie Wheelock - Mother a person of suitable age and discretion residing at Sasha I. Wheelock's usual place of
13	abode.
14	Served on behalf of Sasha I. Wheelock, at Sasha I. Wheelock's place of residence.
15	Service Address: 3920 Badura Ave, Las Vegas, NV 89118-5100
	A description of Julie Wheelock is as follows
16	Gender Color of Skin/Race Hair Age Height Weight Female Caucasian Brown 56-60 5'1 - 5'6 161-180 Lbs
17	Political Control of C
18	Pursuant to NRS 239B.030 this document does not contain the social security number of any person.
19	Affiant does hereby affirm under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.
20	STATE OF NEVADA COUNTY OF Clark
21	Executed on: 7/18/2022
22	by JOHN WHITE Registration: R-2019-00318
23	No notary is required per NRS 53.045
24	×
25	JOHN WHITE
	Registration: R-2019-00318 Reno Carson Messenger Service, Inc #211
26	185 Martin St.

Reno, NV 89509 (775) 322-2424 www.renocarson.com

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