1		ADA STATE BOARD OF E THERAPY
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3	In the Matter of:	Case No. NVMT-C-21079
4	Michael W. Jackson,	COMPLAINT AND NOTICE OF HEARING
5	Licensed Massage Therapist Nevada License No. NVMT.4748,	NOTICE OF HEARING
7	Respondent.	
8	The Nevada State Board of Massage Ther	apy ("Board"), by and through its Executive Director,
9	Sandra Anderson, hereby notifies Michael W. Ja	ackson ("Respondent") of an administrative hearing.
10	which is to be held pursuant to Chapters 233B, 6	22, 622A of the Nevada Revised Statutes (NRS) and
11	640C of the Nevada Revised Statutes (NRS) and t	he Nevada Administrative Code (NAC). The purpose
12	of the hearing is to consider the allegations stated	below and to determine if the Respondent should be
13	subject to an administrative penalty as set forth i	n NRS 640C.710, if the stated allegations are proven
14	at the hearing by the evidence presented.	
15	Respondent is currently and at all times	mentioned herein, licensed as a massage therapist in
16	the State of Nevada and is therefore, subject to th	e jurisdiction of the Board and the provisions of NRS
17	Chapter 640C.	
18	IT IS HEREBY ALLEGED AND CHAR	GED AS FOLLOWS:
19		ED FACTS
20	1.eeOn or about November 11, 2021, Res	pondent failed to drape the breasts of a female client, ee
21.	massaged the breast area, and expo	sed and touched her genitals during the course oee
22	practicing massage.ee	
23		
24		
25		ONS OF LAW
26		NT ONE
27		genitals during the course of practicing massageee
28	A A	f NRS 640C.700(4) and/or (9). This is grounds foee
20	discipline pursuant to NRS 640C.700	2).ee

1	COUNT TWO
2	3.nnBy attempting sexual activity on female client during the course of practicing massagenn
3	Respondent violated the provisions of NRS 640C.700(4) and/or (9). This is grounds fonn
4	discipline pursuant to NRS 640C.700(2).nn
5	COUNT THREE
	4.nnBy improperly draping female client during the course of practicing massage, Respondennn
6	violated the provisions of NRS 640C.700(9) and/or NAC 640C.340. This is grounds fonn
7	discipline pursuant to NRS 640C.700(2).nn
8	
9	PRAYER FOR RELIEF
10	WHEREFORE, Executive Director, Sandra Anderson, prays as follows:
11	5.nnThat 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.710pn
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, (cnn
15 16	recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (enn
10	suspend, revoke or place conditions on the licensee's license, (f) place the licensee onn
18	probation, and/or (g) such other impositions as may be permitted by Nevada law.nn
19	PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider thi
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. Register in advance for this meeting:
25	https://us06web.zoom.us/j/86981107368?pwd=cVhxOFhuVGRNOTV3clhvTnRPOUZKdz09
26	Meeting ID: 869 8110 7368
27	Password: 627930
28	

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

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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.

8 You have the right to request that the Board issue subpoenas to compel witnesses to testify 9 and/or evidence to be offered on your behalf. In making this request, you may be required to 10 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 o Chapter 640C of NRS and if the allegations contained herein are substantially proven by the evidenc presented to further determine what administrative penalty is to be assessed against the Respondent, i any, pursuant to NRS 640C.710.

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.

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 b 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, withou 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 considerin your character, alleged misconduct, competence, or physical or mental health.

Dated this 2/St day tof 2021.

NEVADA STATE BOARD OF MASSAGE THERAPY SANDRA ANDERSON, Executive Director

1					
2	CERTIFICATE OF SERVICE				
3	I HEREBY CERTIFY that on December, 2021, I personally served Michael W. Jackson,				
4	a true and correct copy of the foregoing COMPLAINT AND NOTICE OF HEARING, properl				
5	addressed as follows:				
6					
7	Michael W. Jackson				
8 9	3929 Woodhill Ave. Las Vegas, NV 89121				
10					
11	Consider for the NEWADA OTATE DOADD OF MARCACE TYPED ADM				
12	Service provider for the NEVADA STATE BOARD OF MASSAGE THERAPY				
13	Signature				
14					
15	Reno Carson Messenger Service, Inc.				
16	185 Martin Street Reno, NV 89509				
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Nevada State Board of Massage Therapy 1755 E Plumb Ln Ste 252 Reno, NV 895023656

GPS: 36.1128336;-115.0882454

Chapp

Brought to you by: Reno/Carson Messenger Service Inc

Process Serving & Legal Courier RENO/CARSON/LAS VEGAS Serving all of Netwada Since 1961

(775) 322-2424 Server: AMANDA POWELL

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. Jacksor	ו	
BY LEAVING WITH:	John Doe , Roomm	ate	
PHYSICAL DESCRIPTION:	Age: 46 - 50 Sex: Male	Weight: 221-240 Lbs Height: 5'7 - 6'0	Hair: Gray/White Race: Caucasian
DATE & TIME OF SERVICE:	12/23/2021 6:45 PM		
ADDRESS, CITY, AND STATE:	3929 Woodhill Ave Las Vegas, NV 891	216252	
COMPLETED BY Server Report:	Individual confirm	VELL reg#: R-2019-11004 ned residency of himself and S ated that he will leave docume	Subject. Individual initially refused documents, nts 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 IN AND FOR THE COUNTY OF CARSON CITY				
3	In the Matter of Michael W. Jackson, Licensed Massage Therapist Nevada License No. NBMT. 4748,				
4	Plaintiff(s), CASE NO: NVMT-C-21079 VS.				
5	Defendant(s),				
6					
7	DECLARATION OF SERVICE				
8					
9	SS::				
10	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.				
11	That Affiant received copy(ies) of the COMPLAINT AND NOTICE OF HEARING; On 12/23/2021 and served the same or 12/23/2021 at 6:45 PM by delivery and leaving a copy with:				
12	2. John Doe - Roommate a person of suitable age and discretion residing at Michael W. Jackson's usual place of a				
13	2. John Doe - Roommate a person of suitable age and discretion residing at Michael W. Jackson's usual place of a a abode.aa				
14	Served on behalf of Michael W. Jackson, at Michael W. Jackson's place of residence.				
15	Service Address: 3929 Woodhill Ave, Las Vegas, NV 89121-6252				
16	A description of John Doe is as followsGenderColor of Skin/RaceHairAgeHeightWeightMaleCaucasianGray/White46 - 505'7 - 6'0221-240 Lbsaa				
17	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 by AMANDA POWELL Registration: R-2019-11004				
24	No notary is required per NRS 53.045				
25	AMANDA POWELL Registration: R-2019-11004				
26	Reno Carson Messenger Service, Inc #211 185 Martin St.				
27	Reno, NV 89509 (775)岛22-2424aa				
28	www.renocarson.comaa				
	.R131406				

R	ENO/CA	RSON MES	SENGER SERV	ICE INC, LIC #	211 proce	ss@renocarson	.com ₽ (775) 322-2424	
Nevad 1755 E Reno,	IAME & ADDRESS: CUST #: 004910 Ida State Board of Massage Thera E Plumb Ln Ste 252 0, NV 895023656		nera				R131406	
. ,	\$87-9953				11			
Email:	ct: Tereza Var tvanhorn@lm	it.nv.gov			11		STANDARD	
BILLIN	ig / File #: N	IVMT-C-2	21079	DATE / RECEIVED	2: 12/23/2021		Routine Serve	
3	HEARING DA	TE:		DUE DATE #:		COURT / DESTINATION:		
-	1/12/2022		12/3	12/30/2021		BEFORE THE NEVADA STATE BOARD CASE# NVMT-C-21079		
					I	Plaintiff: In the Matter of VS.	Michael W. Ja	
ADVAN	ICE WITNES		RULES:A		I	Defendant:		
L 1. SUB-91 SERVICE MAILING	ERVICE OK at re: ONLY at subject REQUIRED.		empt to CO-RESIDENT (14+ y ement.3, SERVICE OK DAY	J rs)2, PERSONAL S À WEEK, 4, NO	t	DOCS: COMPLAINT AND NOT	ICE OF HEARING;;	
Servee	Michae	el W. Jacks	on					
Special	Instructions:	N١	/ RULES: When	serving in indiv	idual. RES	SIDENCE ok to si	ub to CO-resident over 14	
		ΥC	DA. At work PER	SUNAL SVC L	JNLY!			
	Served To: Served At:				Title/Rel: Date: Time: Server:			
				PHYSICAL DE	SCRIPTION			
SEX	M /	F Age:	Hair.	Race:	Weight:	Height		
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ADDR #	DATE	TIME		NOTES	FROM			
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