

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Jorge E. Moyano,

Licensed Massage Therapist
Nevada License No. NVMT.8126,

Respondent.

Case No. NVMT-C-21060

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Sandra Anderson, hereby notifies Jorge E. Moyano ("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. On or about August 16, 2021, Respondent, while working as an independent contractor for Massage2Go was dispatched to performed massage services to WH in her hotel room while she was staying at the Wynn Hotel & Casino located at 3131 S. Las Vegas Blvd., Las Vegas, Nevada 89109.
2. During the course of the massage, Respondent touched WH's vagina, nipples and buttocks and placed his mouth on her breasts.
3. During the course of the massage, Respondent exposed WH's breasts.
4. The same day, Respondent was arrested for 2 counts of **Open/Gross Lewdness and 2 Counts of Sexual Assault (Felonies)**.

1 5. On or about November 23, 2021, Respondent pled guilty in case number C-21-360545-1 in
2 the Eight Judicial District Court to **Coercion/Sexual Assault (Felony)**.

3
4 **VIOLATIONS OF LAW**

5 **COUNT ONE**

6 6. By soliciting sexual activity during the course of practicing a massage, Respondent
7 violated the provisions of NRS 640C.700(4) and/or (9). This is grounds for discipline
8 pursuant to NRS 640C.700(2).

9 **COUNT TWO**

10 7. By improperly draping WH's breasts during the course of a massage, Respondent violated
11 the provisions of NAC 640C.340 and/or NRS 640C.700(9). This is grounds for discipline
12 pursuant to NRS 640C.700(2).

13 **COUNT THREE**

14 8. By being convicted of crime involving a sexual offense, Respondent violated the
15 provisions of NRS 640C.700(3) and/or (9). This is grounds for discipline pursuant to NRS
16 640C.700(2).

17 **PRAYER FOR RELIEF**

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

19 9. That the Board conduct a hearing on this complaint as provided by statute, and after such
20 hearing, that the Board impose upon Respondent the discipline permitted by NRS
21 640C.710, which may include the following, (a) the imposition of an administrative fine of
22 not more than \$5,000.00 per violation, (b) recovery of reasonable investigative fees and costs
23 incurred, (c) recovery of attorney fees pursuant to NRS 622.400, (d) licensee be publicly
24 reprimanded, (e) suspend, revoke or place conditions on the licensee's license, (f) place the
25 licensee on probation, and/or (g) such other impositions as may be permitted by Nevada law.
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1 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
2 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
3 622, 622A and 640C of the Nevada Revised Statutes.

4 THE HEARING WILL TAKE PLACE on **Wednesday, March 30, 2022, commencing at**
5 **9:00 a.m.** or as soon thereafter as the Board is able to hear the matter with video conferencing by
6 Zoom.

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

9 <https://us06web.zoom.us/j/84202990113?pwd=ZDM2c25scnhBbmRydjR1S1hwS2d1QT09>

10 Meeting ID: 842 0299 0113

11 Password: 993954

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

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

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

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

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

27 Should the Respondent fail to appear at the hearing, a decision may still be reached by the
28 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.

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 28 day of February, 2022.

9 NEVADA STATE BOARD OF MASSAGE THERAPY

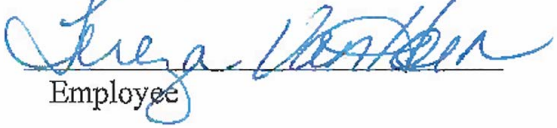
10 
11 SANDRA ANDERSON, Executive Director

12 CERTIFICATE OF SERVICE

13 I HEREBY CERTIFY that on February 28, 2022, I deposited for mailing at Reno, Nevada,
14 via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the
15 foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
16
17

18 Jorge E. Moyano
19 11 Split Hoove Court
20 Henderson, NV 89012

21 NEVADA STATE BOARD OF MASSAGE THERAPY

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23 Employee

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