

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

Joshua Robert Taylor Jurinek,
Licensed Massage Therapist
Nevada License No. NVMT.7945,
Respondent.

Case No. NVMT-C-23052

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies Joshua Robert Taylor Jurinek (“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 at all times mentioned herein, was 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 March 1, 2022, Respondent, while working at Suarez Physical Therapy located at 6930 S. Cimarron Rd., Las Vegas, NV 89113, performed a massage for S.T.

2. After the massage, on March 3, 2022, S.T. reported to her general practitioner that Respondent had positioned himself so that his genitals touched S.T.’s hand and digitally penetrated her vagina. The general practitioner suggested to S.T. that S.T. report this to Las Vegas Metropolitan Police.

1 may include the following, (a) the imposition of an administrative fine of not more than \$5,000.00 per
2 violation, (b) recovery of reasonable investigative and hearing fees and costs incurred, (c) recovery of
3 attorney fees pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e) suspend, revoke or place
4 conditions on the licensee's license, (f) place the licensee on probation, and/or (g) such other impositions
5 as may be permitted by Nevada law.

6 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
7 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
8 622, 622A and 640C of the Nevada Revised Statutes.

9 THE HEARING WILL TAKE PLACE on **Wednesday, September 11, 2024, commencing**
10 **at 9:00 a.m.** or as soon thereafter, at 1755 E. Plumb Ln., Suite 254, Reno, NV 89502. The hearing
11 may also be attended virtually via Zoom. The Zoom information is as follows:

12 <https://us06web.zoom.us/j/87910447853?pwd=B8PbS0eOO8NBSdiVIBkcPaVSL3g4sV.1>

13 **Meeting ID: 879 1044 7853**

14 **Passcode: 071458**

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

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

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

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

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

3 If you require the services of an interpreter, one will be provided for you at no charge. Please
4 notify our office of your request by calling 775.687.9955 or emailing nvmassgebd@lmt.nv.gov by
5 Wednesday, September 4, 2024.

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

9 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
10 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
11 contacting Angela Lee, (702) 486-3898 or amlee@ag.nv.gov.

12 Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may, without
13 further notice, take administrative action against your license and/or certificate to practice within the
14 State of Nevada if the Board determines that such administrative action is warranted after considering
15 your character, alleged misconduct, professional competence, or physical or mental health.

16 Dated this 21st day of August, 2024.

17 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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21 ELISABETH BARNARD, Executive Director

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on August 21, 2024, I deposited for mailing at Reno, Nevada, via
3 Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing
4 **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:
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6 Joshua Robert Taylor Jurinek
7 2435 Ember Mist Ct.
8 Las Vegas, NV 89135

9 NEVADA STATE BOARD OF MASSAGE THERAPY

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