

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:
WAYNE ANDERSON,

Licensed Massage Therapist
Nevada License No. NVMT.9575

Respondent.

Case No. NVMT-C-25072

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies WAYNE ANDERSON ("Respondent") of an administrative hearing, which is to be held pursuant to Chapters 233B, 241, 622, and 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. RESPONDENT is licensed by the Board as a massage therapist, pursuant to the provisions of Nevada Revised Statutes and Nevada Administrative Code chapters 640C, license no. 9575.

2. RESPONDENT is subject to the jurisdiction of the Board and the provisions of NRS Chapter 640C and NAC Chapter 640C.

3. On or about July 21, 2025, while working for Summerlin Body Therapeutics/Elevation Massage located at 7454 West Washington Ave. Ste. 210, Las Vegas, NV 89128, RESPONDENT

1 performed a massage on a female client, E.M.

2 4. During said massage, RESPONDENT improperly draped E.M.'s body
3 leading to multiple instances of breast exposure. It is further alleged that, while performing the
4 massage, RESPONDENT glided over her gluteal cleft multiple times.
5

6 **VIOLATIONS OF LAW**

7 **COUNT ONE**

8 5. Failing to respect and maintain a client's right to privacy as per NAC
9 640C.410(1)(b)(13).
10

11 **COUNT TWO**

12 6. Engaging in unprofessional conduct with a client outside of the professional boundaries
13 considered acceptable in the profession as per NAC 640C.410(1)(b)(28).

14 **COUNT THREE**

15 7. Engaging in unethical and/or unprofessional conduct as per NRS 640C.700(9).

16 **COUNT FOUR**

17 8. Failing to properly drape client as per NAC 640C.340.
18

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Executive Director, Elisabeth Barnard, prays as follows:

21 1. That the Board conduct a hearing on this complaint as provided by statute, and after
22 such hearing, that the Board impose upon Respondent the discipline permitted by NRS 640C.710, which
23 may include the following, (a) the imposition of an administrative fine of not more than \$5,000.00 per
24 violation, (b) recovery of reasonable investigative fees and costs incurred, (c) recovery of attorney fees
25 pursuant to NRS 622.400, (d) licensee be publicly reprimanded, (e) suspend, revoke or place conditions
26 on the licensee's license, (f) place the licensee on probation, and/or (g) such other impositions as may be
27 permitted by Nevada law.
28

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
5 THE HEARING WILL TAKE PLACE on **October 22, 2025, commencing at 9:00 a.m.** or as
6 soon thereafter, at 1755 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may also be attended
7 virtually via Zoom. The Zoom information is as follows:

8 <https://us06web.zoom.us/j/84159636052?pwd=b8LkkWLpWMINUJwcQgiu90MJIH6cgG.1>
9

10 Meeting ID: 841 5963 6052
11 Passcode: 929477

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/or NAC and if the allegations contained herein are substantially proven by
25 the evidence presented to further determine what administrative penalty is to be assessed against the
26 Respondent, if any, pursuant to NRS 640C.710.
27
28

1 If you require the services of an interpreter, one will be provided for you at no charge. Please
2 notify our office by calling (775) 687-9955 or emailing nvmassgebd@lmt.nv.gov by Wednesday,
3 October 15, 2025, of your request.

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

7 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
8 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
9 contacting **Deputy Attorney General Stephanie Itkin Esq.** at **702-486-3208**.

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

14
15 Dated this 2nd day of October 2025.

16
17 **NEVADA STATE BOARD OF MASSAGE THERAPY**

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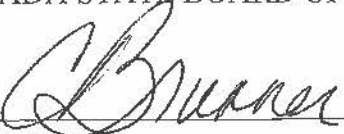
20 ELISABETH BARNARD, Executive Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 3rd 2025, I deposited for mailing at Reno, Nevada, via Certified U.S. Mail, with return receipt and postage prepaid, a true and correct copy of the foregoing **COMPLAINT AND NOTICE OF HEARING**, properly addressed as follows:

Wayne Anderson
9951 Ravenswood Peak Ave
Las Vegas, NV 89178

NEVADA STATE BOARD OF MASSAGE THERAPY



Employee

9489 0090 0027 6603 6319 82