

BEFORE THE NEVADA STATE BOARD OF
MASSAGE THERAPY

In the Matter of:

CAMERON J. MONTANARI,

Licensed Massage Therapist
Nevada License No. 11589,

Respondent.

Case No. NVMT-C-25002

**COMPLAINT AND
NOTICE OF HEARING**

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies CAMERON J. MONTANARI ("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. 11589.

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 January 8, 2025, while working at Ahhh! Massage located at 3080 Vista

1 Blvd. Suite 114, Sparks, NV 89434, RESPONDENT performed a massage on a female client, H.T.

2 4. During the massage, Cameron spread open her vagina and used two fingers in a circular
3 motion on her clitoris.

4 5. Later in the massage Cameron placed his genitals on the hand of female client, H.T.

5 6. As a result of these actions, RESPONDENT was arrested for Sexual Assault
6 (WC250000132) on or about January 29, 2025.

7 7. On or about May 6, 2025, RESONDENT was charged with the following counts: 1.)
8 Sexual Assault, 2.) Open and Gross Lewdness, 3.) Open and Gross Lewdness 4.) Open and Gross
9 Lewdness.

10 8. RESPONDENT is currently scheduled to be in Court for a preliminary hearing on or
11 about October 22, 2025. (Case No. RCR2025-130957).

12
13 **VIOLATIONS OF LAW**

14 **COUNT ONE**

15 9. Engaging in sexual activity with a client as per NRS 640C.700(4).

16 **COUNT TWO**

17 10. Engaging in sexual contact with a client as per NAC 640C.400(2).

18 **COUNT THREE**

19 11. Engaging in sexual contact with a client as per NAC 640C.410(1)(b)(18).

20 **COUNT FOUR**

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

22 **COUNT FIVE**

23 13. Failing to respect and maintain a client's right to privacy as per NAC
24 640C.410(1)(b)(13).

25
26 **PRAYER FOR RELIEF**

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

28 1. That the Board conduct a hearing on this complaint as provided by statute, and after

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

7 PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider this
8 Administrative Complaint against the above-named Respondent in accordance with Chapters 233B,
9 622, 622A and 640C of the Nevada Revised Statutes.

10
11 THE HEARING WILL TAKE PLACE on **August 12, 2025, commencing at 9:00 a.m.** or as soon
12 thereafter, at 1755 E Plumb Ln., Suite 254, Reno, NV 89502. The hearing may also be attended
13 virtually via Zoom. The Zoom information is as follows:

14
15 <https://us06web.zoom.us/j/81303628625?pwd=uTi5F27rbUmImc3kOydXNtTTpsa1HM.1>

16 Meeting ID: 813 0362 8625
17 Passcode: 445214

18
19 PURSUANT TO NRS 622A.320, Respondent may, but is not required to, file an answer to
20 this Complaint with the Board.

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

22 As the Respondents, you are specifically informed that you have the right to appear and be
23 heard in your defense, either personally or through counsel of your choice. You have the right to
24 respond and to present relevant evidence and argument on all issues involved. You have the right to
25 call and examine witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter
26 relevant to the issues involved.
27
28

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

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

8 If you require the services of an interpreter, one will be provided for you at no charge. Please
9 notify our office by calling (775) 687-9955 or emailing nvmassgebd@lmt.nv.gov by Wednesday,
10 August 6, 2025, of your request.

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

14 Pursuant to NRS 233B.121(5), informal disposition of this case may be made by stipulation,
15 agreed settlement, consent order, or default. Any attempt to negotiate this case should be made by
16 contacting **Senior Deputy Attorney General Todd M. Weiss Esq. at 702-486-3103**

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

21
22 Dated this 27th day of July, 2025.

23
24 **NEVADA STATE BOARD OF MASSAGE THERAPY**

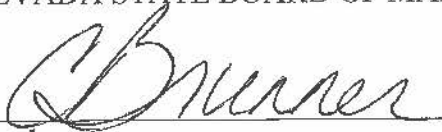
25
26 
27 _____
28 ELISABETH BARNARD, Executive Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 29, 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:

Cameron J. Montanari
255 Karsten Ct
Reno, NV 89506

NEVADA STATE BOARD OF MASSAGE THERAPY



Employee

9489 0090 0027 6603 6316 30