BEFORE THE NEVADA STATE BOARD OF MASSAGE THERAPY

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Case No. NVMT-C-2500

COMPLAINT AND NOTICE OF HEARING

In the Matter of:

USAMAT HADFIELD,

Licensed Massage Therapist Nevada License No. NVMT. 7062,

Respondent.

The Nevada State Board of Massage Therapy (Board), by and through its Executive Director, Elisabeth Barnard, hereby notifies USAMAT HADFIELD ("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.

A. ALLEGED FACTS

- 1. On April 10, 2022, the Board issued an Order to accept a Stipulation for Settlement of Disciplinary Action (the "Settlement") executed by you on or about March 29, 2022. Per the terms of the Settlement, Respondent's license was placed on probationary status. Terms of that probation required that Respondent:
 - Attend probation orientation.
 - Submit quarterly reports to Board staff.

- o Provide annual copies of business license renewals.
- o Maintain a minimum liability coverage of \$1,000,000.00 per occurrence.
- o Pay an administrative fee of \$600.00 and a fine of \$5,000.00.
- Complete 24 hours of ethics courses provided by the Federation of State Massage
 Therapy Boards.
- Comply with all laws governing massage therapy.
- o Appear before the Board every two (2) years at the time of license renewal.
- Respondent's license was renewed on or about October 1, 2024. Respondent was scheduled
 and noticed to personally appear before the Board at its' public meeting on January 8, 2025.
 Respondent failed to appear before the Board at the January 8, 2025, meeting.

VIOLATIONS OF LAW

COUNT ONE

 By failing to appear before the Board at the time of her license renewal, Respondent has violated the terms of her probation, which is grounds for disciplinary action pursuant to NRS 640C.700(13).

PRAYER FOR RELIEF

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

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

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

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

https://us06web.zoom.us/j/87362552149?pwd=pB7Fol92avA9nNgx3MsfZnoagpwQRe.1

Meeting ID: 873 6255 2149 Passcode: 838718

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

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.

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

If you require the services of an interpreter, one will be provided for you at no charge. Please notify our office by calling (775) 687-9955 or emailing nvmassgebd@lmt.nv.gov by Wednesday, March 5, 2025, of your request.

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

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 by contacting Senior Deputy Attorney General Todd M. Weiss Esq. at 702-486-3103

Pursuant to NRS 241.033(2)(b), the Nevada State Board of Massage Therapy may, without 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 considering your character, alleged misconduct, professional competence, or physical or mental health.

Dated this 25th day of February, 2025,

NEVADA STATE BOARD OF MASSAGE THERAPY

ELISABETH BARNARD, Executive Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 25, 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:

USAMAT HADFIELD 9550 S. Eastern Ave., Unit 140 Las Vegas, NV 89123

NEVADA STATE BOARD OF MASSAGE THERAPY

Employee