

**IN THE MATTER OF
LIRONG CHEN, LMT**

Respondent

License No. M06709

*** BEFORE THE MARYLAND
* STATE BOARD OF
* MASSAGE THERAPY EXAMINERS
* Case No. 25-15M**

* * * * *

CONSENT ORDER

On October 23, 2025, the Maryland State Board of Massage Therapy Examiners (the “Board”) charged Licensed Massage Therapist (“LMT”) **LIRONG CHEN** (the “Respondent”), License Number **M06709**, under the Maryland Massage Therapy Act, Md. Code Ann., Health Occ. §§ 6-101 *et seq.*

On January 28, 2026, a Case Resolution Conference (“CRC”) was held before a Committee of Board members to determine whether it would be possible to resolve the Charges with a consent order in lieu of an evidentiary hearing. The Respondent and her legal counsel were in attendance, as was the assigned Assistant Attorney General representing the State. At the CRC, the Respondent presented mitigation, and the Respondent agreed to the resolution of the charges with a public consent order containing the terms and conditions contained herein.

FINDINGS OF FACT

1. The Respondent was initially authorized to practice massage therapy in the State of Maryland on or about October 12, 2022, as a Registered Massage Practitioner

(“RMP”)¹ under registration number R03516. On or about August 23, 2024, the Respondent’s RMP registration was converted to a Licensed Massage Therapist (“LMT”)² license, license number M06709. The Respondent’s license is currently active with an expiration date of October 31, 2026.

2. At all times relevant, the Respondent owned and operated a business in Edgewater, Maryland that offers massage therapy services (the “Massage Establishment”³).

3. On or about October 1, 2024, the Board received reports from the Anne Arundel County Police Department concerning the Massage Establishment.

4. After reviewing the police reports, the Board initiated an investigation of the Respondent under case number 25-15M.

5. As part of its investigation, the Board, *inter alia*, obtained records from the Massage Establishment and interviewed the Respondent under oath.

Aiding and Abetting Unauthorized Practice

6. An Anne Arundel County Police Department officer (“Officer A”) visited the Massage Establishment on or about June 12, 2024 and found that neither of the two employees present (“Unlicensed Employee 1” and “Unlicensed Employee 2”) had a license

¹ In Maryland, a Registered Massage Practitioner (RMP) is an individual who is registered by the Board to practice massage therapy in a setting that is not a health care setting. COMAR 10.65.01.04(B)(10).

² In Maryland, a Licensed Massage Therapist (LMT) is an individual who is licensed by the Board to practice massage therapy. COMAR 10.65.01.04(B)(5).

³ For confidentiality and privacy purposes, the names of individuals and institutions involved in this case are not disclosed in this document. The Respondent may obtain this information by contacting the administrative prosecutor.

or registration to practice massage therapy in the State of Maryland. More specifically, according to the investigative report, during Officer A's visit to the Massage Establishment, the following occurred:

- a. When Officer A first walked into the Massage Establishment, he identified himself to "Unlicensed Employee 1" and explained that he was there to make sure that all of the employees performing massage therapy have valid massage therapy licenses;
- b. In response, Unlicensed Employee 1 told Officer A that she does not speak English, called the Respondent, and gave the phone to Officer A;
- c. The Respondent told Officer A that there were only two employees currently at the business, Unlicensed Employee 1 and another employee who left to go shopping;
- d. Officer A asked the Respondent to tell Unlicensed Employee 1 to get any other employees in the business to come to the front and identify themselves, and no one came forward;
- e. In response to Officer A saying that he was getting the impression that the Respondent is the only one with a valid massage therapy license, the Respondent said that there is one other female employee that has a valid massage therapy license, but she is not working today;
- f. Officer A told the Respondent that she needed to close the business for the day if there are no licensed massage therapists present;
- g. In response, the Respondent stated that one employee has a license from Florida and is getting her Maryland license;
- h. Officer A walked to the back of the business, saw that the back door to the business was open, and found Unlicensed Employee 2 walking on the road near the back of the business;
- i. Per Officer A's instructions, Unlicensed Employee 2 returned to the business and showed him her New York state identification card; and

- j. Officer A photographed both employees and their identification cards and again told the Respondent that the business needs to close until an employee with a valid Maryland massage license is working.

7. On or about December 10, 2024, the Board issued a *subpoena duces tecum* to the Respondent for a list of individuals who worked at the Massage Establishment between February 1, 2024 and September 30, 2024 and copies of all licenses and certificates, where applicable.

8. In response, on December 19, 2024, the Respondent sent the Board a letter with information and documentation for four individuals who worked at the Massage Establishment during that timeframe:

- a. The Respondent (Documents provided: photos of Maryland driver's license and Maryland LMT license);
- b. An employee who was initially authorized to practice as an RMP in the State of Maryland on or about March 13, 2024 (the "RMP Employee") ("Title: Registered Massage Practitioner") ("Dates: February 29 – September 30, 2024") (Documents provided: photo of Maryland RMP registration);
- c. Unlicensed Employee 1 ("Title: Cleaner (subcontractor) [cleaning and laundry]") (Documents provided: photo of Maryland driver's license); and
- d. Unlicensed Employee 2 ("Title: Masseuse (Employment Applicant)") ("Dates: 4-6 days in or about the week of June 2, 2024") (Documents provided: photos of New York identification card and what appears to be a State of Florida massage therapist license or registration).

9. During her February 5, 2025 under-oath interview with the Board's Investigator, the Respondent stated, *inter alia*, that:

- a. Unlicensed Employee 2 is one of two employees "currently [...] working at the facility";

- b. Unlicensed Employee 2 works part-time, “one or two days”;
- c. Unlicensed Employee 2 has a Florida license;
- d. Unlicensed Employee 2 does not have a Maryland license, but is in the process of applying for it;
- e. The maximum number of clients that Unlicensed Employee 2 can have in one day is eight, and, “[s]ometimes, if it’s slow, only two or three clients”;
- f. Unlicensed Employee 2 “was a masseuse and she worked for the six days in or about the week of June 2, 2024”; and
- g. On the day in the middle of June when the police stopped by to check licenses, “[...] a client came in. I worked on for about an hour before I left. The remaining half hour were serviced by the part-time person. I left very early because I have something else to – it was [Unlicensed Employee 2] [...]” “[...] I remember that [Unlicensed Employee 2] provided the service on that client;” “[Unlicensed Employee 2] had just came to the store and worked like one day. [Unlicensed Employee 2] did – served on that client.”

10. The Board’s records show that the Board received Unlicensed Employee 2’s initial application for licensure on or about April 17, 2025, and that Unlicensed Employee 2 did not have the authority to practice as a massage therapist in the State of Maryland until she received her LMT license on or about June 12, 2025.

The Massage Establishment’s Client-Treatment Records

11. On or about October 22, 2024, the Board issued a *subpoena duces tecum* to the Massage Establishment for “a computer-generated copy or your original appointment book and any other document(s) on which you maintained schedule(s) for the period February 1, 2024, through September 30, 2024[...].”

12. In response, the Respondent sent the Board “the unredacted copy of [the Massage Establishment’s] appointment book” – 29 pages of photographs of pages of spiral-bound daily planners for some, but not all, dates between February 2, 2024 and September 29, 2024. Most of the handwritten entries in the planners included the time and date of the appointment, the client’s name and phone number, and the length and type of service to be provided.

13. On or about May 13, 2025, the Board issued a *subpoena duces tecum* to the Massage Establishment for records relating to four of these appointments / clients. More specifically, the *subpoena* called for the production of “All written and computer-generated client treatment records, files, invoices, letters, bills, insurance documentation, memoranda, S.O.A.P. notes, office appointment and calendar notations and records and any other related data or records pertaining to the following individuals:

- a. [“Client 1”]: date of service February 20, 2024[;]
- b. [“Client 2”]: date of service May 30, 2024 and June 30, 2024[;]
- c. [“Client 3”]: date of service August 2, 2024[; and]
- d. [“Client 4”]: date of service September 29, 20[2]4[.]”

14. In response to the May 13, 2025 *subpoena duces tecum*:

- a. Client 1 (date of service: February 20, 2024): The Massage Establishment provided no records for Client 1.⁴ In a May 20, 2025 email, Counsel for the Respondent informed the Board that, regarding records for Client 1, “my client performed a diligent and comprehensive but did not have such records.”

⁴ Other than the February 20, 2024 appointment book entry.

- b. Client 2 (date of service: May 30, 2024)⁵: The Massage Establishment provided a one-page undated Consent Form with Client 2's contact information and some general medical information, and a one-page handwritten SOAP note for massage therapy services provided to Client 2 by the RMP Employee on May 9, 2024, but failed to produce any client treatment records for the specified date of service or any other records pertaining to this client⁶.
- c. Client 3 (date of service: August 2, 2024): The Massage Establishment provided a one-page undated Consent Form with Client 3's contact information and some general medical information, and a one-page handwritten SOAP note for massage therapy services provided to Client 3 by the Respondent on June 19, 2024, but failed to produce any client treatment records for the specified date of service or any other records pertaining to this client⁷.
- d. Client 4 (date of service: September 29, 2024): The Massage Establishment provided a one-page undated Consent Form with Client 4's contact information and some general medical information, and a one-page handwritten SOAP note for massage therapy services provided to Client 4 by the RMP Employee on June 29, 2024, but failed to produce any client treatment records for the specified date of service or any other records pertaining to this client⁸.

15. On or about June 2, 2025, the Board issued a *subpoena duces tecum* to the Massage Establishment for all records pertaining to four additional appointments / clients:

- a. "Client 5": date of service May 30, 2024;
- b. "Client 6": date of service June 1, 2024;

⁵ The *subpoena* listed both May 30, 2024 and June 30, 2024 as the date of service for Client 2. However, the appointment book records do not show that Client 2 had an appointment on June 30, 2024, so it appears that this date was listed in the *subpoena* in error.

⁶ Other than appointment book entries for May 9, 2024, May 30, 2024, and approximately four other dates.

⁷ Other than appointment book entries for June 19, 2024, August 2, 2024, and approximately one other date.

⁸ Other than appointment book entries for June 29, 2024, September 29, 2024 and approximately two other dates.

- c. “Client 7”: date of service February 7, 2024; and
 - d. “Client 8”: date of service March 31, 2024.
16. In response to the June 2, 2025 *subpoena duces tecum*:
- a. Client 5 (date of service: May 30, 2024): The Massage Establishment provided a one-page undated form with Client 5’s contact information and some general medical information, but failed to produce any client treatment records for the specified date of service or any other records pertaining to this client⁹.
 - b. Client 6 (date of service: June 1, 2024): The Massage Establishment provided a SOAP note for the specified date of service, and a one-page undated form with Client 6’s contact information and some general medical information.
 - c. Client 7 (date of service: February 7, 2024): The Massage Establishment provided no records for Client 7.¹⁰
 - d. Client 8 (date of service: March 31, 2024): The Massage Establishment provided a one-page undated form with Client 8’s contact information and some general medical information, but failed to produce any client treatment records for the specified date of service or any other records pertaining to this client¹¹.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Board concludes as a matter of law that the Respondent’s conduct, as set forth above, in whole or in part, constitutes grounds for disciplinary action pursuant to the following statutory and regulatory provisions:¹²

⁹ Other than appointment book entries for May 30, 2024 and approximately seven other dates.

¹⁰ Other than the February 7, 2024 appointment book entry.

¹¹ Other than appointment book entries for March 31, 2024 and approximately two other dates.

¹² The statutory and regulatory provisions cited herein refer to the versions that were in effect at the time of the Respondent’s conduct.

**Health Occ. § 6-308. Denials, reprimands, suspensions, and revocations
– Grounds.**

- (a) Subject to the hearing provisions of § 6-309 of this subtitle, the Board may deny a license or registration to an applicant, reprimand a licensee or registration holder, place any licensee or registration holder on probation, or suspend or revoke the license of a licensee or the registration of a registration holder if the applicant, licensee, or registration holder:
- (8) Does an act that is inconsistent with generally accepted professional standards in the practice of massage therapy;
 - (11) Has violated any provision of this title;
 - (20) Engages in conduct that violates the professional code of ethics; [and]
 - (21) Knowingly does an act that has been determined by the Board to be a violation of the Board’s regulations[.]

COMAR 10.65.03.03 Code of Ethics – Standards of Practice

- C. A license holder or registration holder shall:
- (2) Engage in professional conduct at all times, with honesty, integrity, self-respect, and fairness; [and]
 - (8) Report to the Board of Massage Therapy Examiners, or other appropriate authority, conduct in the practice of massage therapy¹³ that indicates a violation of:
 - (a) This chapter;
 - (b) Health Occupations Article, Title 6, Annotated Code of Maryland; or

¹³ “‘Practice massage therapy’ means to engage professionally and for compensation in massage therapy.” Health Occ. § 6-101(g). “‘Massage therapy’ means the use of manual techniques on soft tissues of the human body including stroking, kneading, tapping, stretching, compression, vibration, and friction, with or without the aid of heat limited to hot packs and heating pads, cold water, or nonlegend topical applications, for the purpose of improving circulation, enhancing muscle relaxation, relieving muscular pain, reducing stress, or promoting health and well-being. Health Occ. § 6-101(f)(1).

- (c) Any other law, including but not limited to aiding or abetting the unauthorized practice of massage therapy[.]

D. A licensee or registrant may not:

- (6) Aid or abet any individual violating or attempting to violate any provision of law or regulation.

To wit: Health Occ. § 6-501: Except as otherwise provided in this title, an individual may not practice, attempt to practice, or offer to practice massage therapy, massage, myotherapy, or any synonym or derivation of these terms in the State unless licensed or registered by the Board.

ORDER

Based upon the foregoing Findings of Fact and Conclusions of Law, it is, on the affirmative vote of a majority of the Board, hereby:

ORDERED that the license to practice massage therapy in the State of Maryland held by the Respondent, **LIRONG CHEN**, License Number **M06709**, is **REPRIMANDED**; and it is further

ORDERED that the Respondent's license is placed on **PROBATION** for a minimum period of **TWO (2) YEARS**, subject to the following terms and conditions:

1. The Respondent's status as a licensed massage therapist will be listed in the Board's computer records and website as being on "probation;"
2. Within **SIX (6) MONTHS** of the effective date of this Order, the Respondent shall successfully complete a minimum of **THREE (3) HOURS** of Board-approved training in Record-Keeping and a minimum of **THREE (3) HOURS** of Board-approved training in Ethics. The following terms apply:

- i. It is the Respondent's responsibility to locate, enroll in, and obtain the Board's approval of the courses before the courses begin;
 - ii. The training may be in-person or online, so long as it is live and interactive and not pre-recorded;
 - iii. The Respondent must provide documentation to the Board that the Respondent successfully completed the courses;
 - iv. The courses may not be used to fulfill the continuing education credits required for license renewal;
 - v. The Respondent is responsible for the cost of the courses; and
 - vi. If the Respondent experiences hardship in finding appropriate courses under this term or otherwise satisfying this term's requirement, the Respondent shall notify the Board, in writing, within three (3) months of the effective date of this Order, and the notice shall include a description of the Respondent's efforts to fulfill the requirements of this term;
3. Within **SIX (6) MONTHS** of the effective date of this Order, the Respondent shall take and pass the Board's jurisprudence examination **in person**;
4. The Respondent shall submit to random record reviews conducted by Board staff and/or Board-approved reviewers throughout the term of probation;
5. The Respondent shall allow random quarterly onsite inspections by Board staff and/or Board-approved inspectors;
6. The Respondent shall pay a monetary penalty in the amount of **\$2,500** to the Board within **90 DAYS** of the effective date of this Order; and

7. The Respondent shall comply with the Maryland Massage Therapy Act and all laws and regulations governing the practice of massage therapy in Maryland; and it is further

ORDERED that the Respondent shall at all times cooperate with the Board in the monitoring, supervision, and investigation of the Respondent's compliance with the terms and conditions of this Order. The Respondent's failure to fully cooperate with the Board shall be considered a violation of probation and this Order; and it is further

ORDERED that, if the Respondent allegedly fails to comply with any term or condition imposed by this Consent Order, the Respondent shall be given notice and an opportunity for a hearing. If the Board determines there is a genuine dispute as to a material fact, the Board shall schedule an evidentiary hearing before the Board. If the Board determines there is no genuine dispute as to a material fact, the Respondent shall be given the opportunity to request a show cause hearing before the Board; and it is further

ORDERED that, after the appropriate hearing, if the Board determines that the Respondent has failed to comply with any term or condition imposed by this Consent Order, the Board may reprimand the Respondent's license, place the Respondent's license on additional probation with appropriate terms and conditions, suspend the Respondent's license with appropriate terms and conditions, or revoke the Respondent's license to practice massage therapy in the State of Maryland. The Board may, in addition to one or more of the sanctions set forth above, impose an additional civil monetary fine on the Respondent; and it is further

ORDERED that, no earlier than **ONE (1) YEAR** after the effective date of this Consent Order, the Respondent may submit a written petition to the Board requesting termination of probation. Upon consideration of the petition, the Board, or designated Board committee, may grant the petition and terminate probation, provided that the Respondent has fully and satisfactorily complied with all probationary terms and conditions of this Consent Order, and there are no pending complaints against the Respondent; and it is further

ORDERED that the effective date of the Consent Order is the date the Consent Order is signed by the Board; and it is further

ORDERED that for purposes of public disclosure and as permitted by Md. Code Ann., Gen. Prov. § 4-333(b)(6), this document consists of the foregoing Findings of Fact, Conclusions of Law, and Order, and is reportable to any entity to whom the Board is obligated to report; and it is further

ORDERED that this Consent Order is a Final Order of the Board, and, as such, is a **PUBLIC DOCUMENT** pursuant to Md. Code Ann., Gen. Prov. § 4-333(b)(6) and Md. Code Ann., Health Occ. § 1-607.

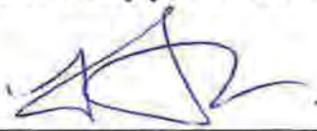
02/25/2026
Date

Sharon Oliver
Sharon J. Oliver, MBA, Executive Director
Maryland State Board of Massage Therapy Examiners

CONSENT

1. By this Consent, for the purpose of resolving the issues raised by the Board in this matter, I waive my right to contest the charges in an evidentiary hearing, and I voluntarily agree to be bound by the foregoing Consent Order.
2. I acknowledge the validity of this Consent Order as if entered after an evidentiary hearing in which I would have had the right to counsel, to testify, to call witnesses, to confront witnesses, and to all other substantial and procedural protections provided by law, which I waive by signing this Consent.
3. I acknowledge the legal authority and the jurisdiction of the Board to enter and enforce this public Consent Order.
4. I waive any right to contest the Findings of Fact, Conclusions of Law, and terms and conditions of this Consent Order, and I waive any right I may have had to appeal or seek judicial review of the final decision in this matter.
5. I sign this Consent voluntarily and without reservation after having had the opportunity to consult with counsel. I fully understand the language, meaning, and effect of this Consent Order, and I agree to comply with the Order's terms and conditions.

February 11, 2026
Date

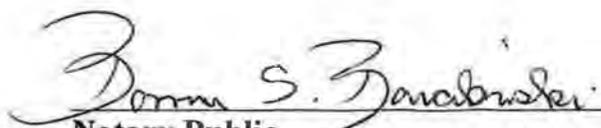


Lirong Chen, LMT

STATE OF MARYLAND
CITY/COUNTY OF Baltimore

I HEREBY CERTIFY that on this 11th day of February, 2026, before me, a Notary Public of the State of Maryland and City/County aforesaid, personally appeared **LIRONG CHEN**, and made an oath in due form of law that the foregoing Consent was her voluntary act and deed.

AS WITNESS, my hand and Notary Seal.



Notary Public
My Commission Expires: 09/23/2027