

IN THE MATTER OF
MINLI JIANG, LMT
RESPONDENT

*** BEFORE THE MARYLAND**
*** STATE BOARD OF**
*** MASSAGE THERAPY**
*** EXAMINERS**
*** Case Number: 25-02M**

License Number: M06526

*** * * * ***

CONSENT ORDER

On June 25, 2025, the Maryland State Board of Massage Therapy Examiners (the “Board”) charged **MINLI JIANG, LMT** (the “Respondent”), License Number **M06526**, with violating the Maryland Massage Therapy Act (the “Act”) codified at Md. Code Ann., Health Occ. §§ 6-101 *et seq.* (2021 Repl. Vol. & 2024 Supp.).

On August 13, 2025, 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, her legal counsel, and an interpreter were in attendance, as was the assigned Assistant Attorney General representing the State. As a result of that conference, the Board and the Respondent agreed to resolve the charges with a public consent order containing the terms and conditions herein.

FINDINGS OF FACT

I. BACKGROUND

1. At all times relevant hereto, the Respondent was licensed to practice massage therapy in the State of Maryland. The Respondent was initially licensed to practice massage

therapy in Maryland on November 9, 2017, under License Number M06526. The Respondent's license expires on October 31, 2026.

2. At all times relevant hereto, the Respondent owned a massage therapy practice (the "Practice")¹ in Baltimore County, Maryland. The Respondent provided massage therapy services at the Practice.

3. The Respondent hired an employee (the "Employee") to provide acupuncture and reflexology services.

4. The Employee is not and has never been licensed to practice massage therapy, acupuncture, or reflexology in Maryland.

5. On or about May 7, 2024, the Board received a complaint (the "Complaint") alleging that, on April 3, 2024, the Employee touched a client's (the "Client") breast during a massage.

II. BOARD INVESTIGATION

6. As part of the Board's investigation, the Board subpoenaed the Client's records from the Practice and conducted under-oath interviews of the Client, the Respondent, and the Employee. The Board also obtained a written statement from the Respondent.

7. On July 3, 2024, the Board conducted an under-oath interview of the Client. During the interview, the Client stated she received a one-hour foot massage from the Respondent, followed by a one-hour full-body massage from the Employee. During the

¹ For confidentiality reasons, the names of all massage facilities, clients, or other individuals referenced in this document will not be identified by name. The Respondent may obtain the identity of any facility, client, or individual referenced herein by contacting the assigned administrative prosecutor.

full-body massage, the Employee “slipped down to touch my breast under my towel...”

She stated:

I know after he was done with the...with...which is pretty traditional in the massages I’ve had of doing, like, my arms, my front of my arms, and my thighs, that you know, go ahead and turn over on my stomach...face down, and that was when he got up on top of the table, which I wasn’t alarmed by, because I’ve had that before...where they’ll take extra pressure, and go ahead, and use that pressure into my back, and when he did that, that’s when he got an erection.²

8. On July 3, 2024, the Board issued a *Subpoena Duces Tecum* to the Respondent directing her to provide, “All written and computer-generated patient treatment records, files, invoices, letters, bills, and any other related data or records pertaining to the following individual...” The subpoena included the Client’s name and directed the Respondent to provide “a detailed narrative of your evaluation and circumstances surrounding the treatment of this individual.”

9. The Respondent provided an “Independent Contactor Agreement” signed by the Respondent and the Employee. The Agreement states, in part, “I am willing to start working...April 1, 2024. I will provide Acupressure, reflexology in a professional and legitimate manner... [sic]”

10. On July 8, 2024, the Respondent e-mailed a written statement to the Board investigator. She explained that she hired the Employee “part time.” “[The Employee] tell [sic] me to do 2hours [sic] foot massage. [sic] and he said me massage her one hour, he [sic] massage her one hour....when I finish one hour, the [sic] part time guy come in massage.”

² The Respondent stated she contacted the police on or about April 5, 2024. The police told her to contact the Board.

11. The Respondent provided handwritten notes on loose-leaf paper listing times and prices. There are no dates listed or specific services provided. The Respondent also provided a receipt dated April 3, 2024, showing that the Client paid the Practice \$172.00, including a thirty-dollar tip.

12. On October 8, 2024, the Board conducted an under-oath interview of the Respondent. During the interview, the Respondent stated that she owns the Practice and hired the Employee, "...mainly for foot massage." She stated, "When I hired him he told me had a license and he told me he would bring it to me. But within two days I haven't [sic] seen him bring it to me."

13. The Respondent advised that the Employee worked from April 1, 2024 to April 3, 2024, for thirty dollars an hour and saw only three clients. According to the Respondent, the Employee said he only performed a foot massage on the Client.

14. The Respondent did not contact the Board to verify the Employee's license status.

15. On February 26, 2025, the Board interviewed the Employee. During the under-oath interview, the Employee stated he is not a licensed massage therapist and does not have certifications for acupuncture or reflexology. In reference to the Client, the Employee stated, "...I think the owner had done the first hour [massage] and then she wanted more..." He also stated the Client tipped him.

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.

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

- (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;

- (9) Is negligent 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;

- (21) Knowingly does an act that has been determined by the Board to be a violation of the Board's regulations[.]

Pursuant to Health Occ. § 6-308(20) and (21), the pertinent provisions of the Code of Maryland Regulations (“COMAR”), provide the following:

COMAR 10.65.03.03 Standards of Practice

- A. The license holder or registration holder shall be concerned primarily with the welfare of the client.

...

- C. A license holder or registration holder shall:

- (1) Use professional discretion and integrity in relationships with members of the public and health care community;

- (2) Engage in professional conduct at all times, with honesty, integrity, self-respect, and fairness[.]

...

D. A license holder or registration holder may not:

...

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

COMAR 10.65.03.04 Relationship with Client

C. A license holder or registration holder shall:

...

- (4) Maintain legible, organized written records of treatment of any client under the care of the licensee or registrant for at least 5 years after termination of treatment and as provided by applicable provisions of Health-General Article, Title 4, Subtitle 3, Annotated Code of Maryland[.]

COMAR 10.65.01.05. Licensure or Registration Required; Exceptions.

An individual shall be licensed by the Board in order to practice massage therapy, and shall be registered by the Board in order to practice massage therapy in a setting that is not a health care setting...[.]

COMAR 10.65.01.08 Licensure

...

- D. A licensee shall display the license and any current renewal license conspicuously in the space where the licensee is engaged in practice, including in any temporary space or in any exhibit location.

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is hereby:

ORDERED that the Respondent's license is placed on **PROBATION**, for a minimum period of **THREE (3) YEARS**.³ During the probationary period, the Respondent shall comply with the following probationary 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 **180 DAYS** of the effective date of this Order, the Respondent is required to take and successfully complete **SIX (6) HOURS** of Board-approved training in **Ethics** and **SIX (6) HOURS** of Board-approved training in **Record Keeping**. The following terms apply:
 - (a) It is the Respondent's responsibility to locate, enroll in, and obtain the Board's approval of the courses before the courses begin.
 - (b) For both the required Ethics and Record Keeping training, the Respondent may take multiple courses, but no more than three (3) courses in each category, to total six (6) hours respectively.
 - (c) Both the Ethics and Record Keeping training may be online, so long as it is live and interactive and not pre-recorded.
 - (d) The Respondent must provide documentation to the Board that the Respondent has successfully completed the courses.
 - (e) The courses may not be used to fulfill the continuing education credits required for license renewal.

³ If the Respondent's license expires during this three-year period, the three-year period and any conditions will be tolled.

(f) The Respondent is responsible for the costs of the courses.

(g) If the Respondent experiences hardship in finding an appropriate course(s) under this term or otherwise satisfying this term's requirement, the Respondent shall notify the Board, in writing, at least 45 days prior to the 180-day deadline to complete the required courses. The notice shall detail the steps the Respondent has taken in fulfilling this term's requirements and the hardship(s) experienced.

2. The Respondent shall submit to random record reviews conducted by Board staff and/or Board-approved reviewers throughout the term of Probation to ensure compliance with the Board's recordkeeping regulations at COMAR 10.65.06 *et seq.*
3. The Respondent shall allow random quarterly onsite inspections by Board staff and/or Board-approved inspectors at any location where the Respondent practices massage therapy.
4. The Respondent shall pay a monetary penalty in the amount of two-thousand five-hundred dollars (\$2,500) within ninety (90) days of the effective date of the Order; and
5. 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 the Order. The Respondent's failure to fully cooperate with the Board shall be considered a violation of probation of this Order; and it is further

ORDERED that after the conclusion of the **THREE (3) YEAR** probationary period imposed by this Order, the Respondent may submit a written petition to the Board requesting termination of probation. After consideration of the petition, the probation may be terminated through an order of the Board. The Board, at its discretion, may grant termination if the Respondent has fully and satisfactorily complied with all the terms and conditions of the Order, and there are no pending investigations or complaints against the Respondent, and the Board deems termination of probation appropriate. If the Respondent fails to make any such petition, then the probationary period status may continue indefinitely, subject to the conditions set forth in this Order; and it is further

ORDERED that if the Respondent allegedly fails to comply with any of the terms and conditions of this Order, the Respondent shall be given notice and an opportunity for a hearing. If the Board determines that there is a genuine dispute as to a material fact, the hearing shall be an evidentiary hearing before the Board. If 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 of probation or this Order, the Board may reprimand the Respondent's license, place the Respondent's license on probation with appropriate terms and conditions, or suspend or revoke the Respondent's license to practice massage therapy in Maryland. The Board may, in addition to one or

more of the sanctions set forth above, impose a civil monetary fine upon the Respondent; and it is further

ORDERED that, unless stated otherwise in the order, any time prescribed in this order begins when the Order goes into effect. The Order goes into effect upon the signature of the Board's Executive Director, who signs on behalf of 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 Order is a Final Order 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.

10/22/2025
Date

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

CONSENT

By this Consent, I, Minli Jiang, agree and accept to be bound by this Consent Order and its conditions and restrictions. I waive any rights I may have had to contest the Findings of Fact and Conclusions of Law.

I acknowledge the validity of this Consent Order as if entered into after the conclusion of a formal evidentiary hearing in which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to all other substantive and procedural protections as provided by law. I acknowledge the legal authority and the jurisdiction of the Board to initiate these proceedings and to issue and enforce this Consent Order. I also affirm that I am waiving my right to appeal any adverse ruling of the Board that might have followed any such hearing.

I sign this Consent Order after having had the opportunity to consult with counsel, and I fully understand and comprehend the language, meaning and terms of this Consent Order. I voluntarily sign this Order and understand its effect.

9-25-2025

Date

Minli Jiang LMT

Minli Jiang, LMT

NOTARY PUBLIC

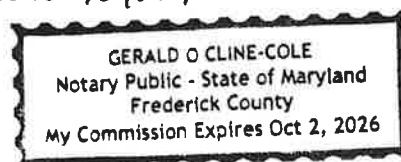
STATE OF Maryland

CITY/COUNTY OF: Frederick

I HEREBY CERTIFY that on this 25th day of September 2025, before me, a Notary Public of the State and County aforesaid, personally appeared Minli Jiang, and gave oath in due form of law that the foregoing Consent Order was his voluntary act and deed.

AS WITNESS, my hand and Notary Seal.

Notary Public 10/02/2026



My commission expires: 10/02/2026