

IN THE MATTER OF	*	BEFORE THE MARYLAND
HAIHUA ZHENG, RMP	*	STATE BOARD OF MASSAGE
Respondent	*	THERAPY EXAMINERS
Registration Number: R03389	*	Case Number: 24-25M
* * * * *	*	* * * * *

CONSENT ORDER

On May 28, 2025, the Maryland State Board of Massage Therapy Examiners (the “Board”) issued a Notice of Intent to Revoke Registration to **HAIHUA ZHENG, RMP** (the “Respondent”), Registration Number R03389, charging her with violating the Maryland Massage Therapy Act (the “Act”), Md. Code Ann., Health Occupations (“Health Occ.”) §§ 6-101 *et seq.* (2021 Repl. Vol. & 2024 Supp.).

Specifically, the Board charged the Respondent with violating the following provisions of the Act and Md. Code Regs. (“COMAR”):

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

- (a) *In general* -- Subject to the hearing provision 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:
 - (2) Fraudulently or deceptively uses a license or registration;
 - (8) Does an act that is inconsistent with generally accepted professional standards in the practice of massage therapy;
 - (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[.]

The violations of professional code of ethics and Board regulations include:

COMAR 10.65.01.08 Licensure

- D. Display of License. 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.

COMAR 10.65.03 Code of Ethics

.03 Standards of Practice

- A. The licensee or registrant shall be concerned primarily with the welfare of the client.
- C. A license holder or registration holder shall:
- (2) Engage in professional conduct at all times, with honesty, integrity, self-respect and fairness;
 - (5) At all times respect the client's dignity, autonomy, and privacy;
 - (6) Practice massage therapy only as defined in the scope of practice set out in Health Occupations Article, § 3-5A-01, Annotated Code of Maryland;
 - (8) Report to the Board of Massage Therapy Examiners, or other appropriate authority, conduct in the practice of massage therapy that indicates a violation of:
 - (a) This chapter;
 - (b) Health Occupations Article, Title 6, Annotated Code of Maryland; or
 - (c) Any other law, including but not limited to aiding or abetting the unauthorized practice of massage therapy[.]
- D. A license holder or registration holder may not:

- (2) Knowingly engage in or condone behavior that:
 - (a) Is fraudulent,
 - (b) Is dishonest,
 - (c) Is deceitful, or
 - (d) Involves moral turpitude.
- (6) Aid or abet any individual violating or attempting to violate any provision of law or regulation.

.04 Relationship with Client.

A. A license holder or registration holder shall:

- (1) Use professional judgment in the use of evaluation and treatment procedure;
- (4) Maintain legible, organized written records of treatment of any client under the care of the license holder or registration holder 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;
- (5) Make the written records available to the client upon request, in compliance with applicable laws for disclosure of medical records;
- (7) Accurately inform clients, other health care professionals, and the public of the limitations of massage therapy;

.05 Professional Boundaries.

A. A licensee or registrant shall:

- (1) Maintain professional boundaries, even when the client, staff member, or student initiates crossing the professional boundaries of the professional relationship; and

- (2) Respect and maintain professional boundaries and respect the client's, staff member's, or student's reasonable expectation of professional conduct.

B. A licensee or registrant may not:

- (1) Exploit a relationship with a client, staff member, or student for the licensee's or the registrant's personal advantage, including, but not limited to, a personal, sexual, romantic, or financial relationship;
- (2) Engaged in a sexually intimate act with a client; or
- (3) Engage in sexual misconduct that includes, but is not limited to:
 - (b) Non bona fide treatment; or
 - (d) A sexually exploitative relationship.

.06 Records, Confidentiality, and Informed Consent.

A licensee or registrant shall:

- D. Provide sufficient information to a client to allow the client to make an informed decision regarding treatment, including:
- (1) The purpose or nature of an evaluation or treatment regime;
 - (2) Alternatives to treatment;
 - (3) Side effects and benefits of a proposed treatment regimen and the alternatives to that treatment;
 - (5) The right of the client to withdraw from the treatment at any time, including the risks associated with withdrawing from treatment[.]

COMAR 10.65.06.01. General Requirements

- A. The licensee or registrant shall maintain accurate, legible, and organized client records for every client, regardless of the procedure or modality employed.
- B. Sufficient information to be obtained and recorded shall include, at a minimum:
 - (1) Name, address, and other appropriate contact information;
 - (2) Summarized client history;
 - (3) Summarized reason for appointment or referral, including referral documentation, including forwarded reports and correspondence, if applicable;
 - (4) Billing and insurance documentation, if applicable; and
 - (5) Massage session summary in standard SOAP format, or its equivalent, which includes, at a minimum:
 - (a) Initial client assessment, including contraindications noted;
 - (b) Summarized therapy plan; and
 - (c) Progress notes, reflecting summary of techniques used and response to techniques.

On August 29, 2025, a Case Resolution Conference ("CRC") was held before a committee of the Board. As a resolution of this matter, the Respondent agreed to enter this public Consent Order consisting of Findings of Fact, Conclusions of Law, and Order.

FINDINGS OF FACT

The Board makes the following Findings of Fact:

I. BACKGROUND

1. At all times relevant, the Respondent was and is registered to practice massage therapy in the State of Maryland. The Respondent was originally registered to practice massage therapy in Maryland on August 2, 2021, under Registration Number R03389. The Respondent's registration is scheduled to expire on October 31, 2026, subject to renewal.

2. From approximately February 2024 to September 2024, the Respondent was employed as a massage practitioner at a massage therapy establishment (the "Spa")¹ owned by an unlicensed individual (the "Owner") located in Arnold, Maryland.

3. On or about April 1, 2024, the Board received an incident report (the "April Incident Report") from a detective (the "Detective") with the Anne Arundel County Police Department, Vice Unit ("AAPD"). In the April Incident Report, the Detective reported that on January 5, 2024, AAPD initiated an investigation of the Spa that included undercover operations during which the Respondent was present. The AAPD investigation revealed potential prostitution, unlicensed practice of massage therapy and other regulatory violations occurring at the Spa. On February 21, 2024, the Owner was arrested and charged with the misdemeanor offense of practicing massage therapy without a license.

¹ For confidentiality purposes, the names of individuals and establishments are not disclosed in this document.

II. BOARD INVESTIGATION

A. AAPD Undercover Operations

4. After receiving the April Incident Report, the Board initiated an investigation of the Respondent.

5. The Board's investigation revealed that in or around January 2024, AAPD initiated an investigation of the Spa after discovering online postings from clients indicating the Spa was engaging in prostitution activity.

6. On or about January 5, 2024, an undercover officer of AAPD ("UC-1") went to the Spa and attempted to receive massage therapy. UC-1 was unable to receive massage therapy because he did not have an appointment. However, UC-1 noticed a lone Maryland massage practitioner registration posted on the wall where the name and the registration number were whited-out. UC-1 later determined that the wall license, which expired on October 31, 2020, belonged to a relative of the Owner ("Individual 1").

7. Later in the afternoon of January 5, 2024, at approximately 1:25 p.m., a second undercover officer ("UC-2") went to the Spa and received massage therapy from an employee (the "Employee"), whom UC-2 later discovered to be unlicensed. During the massage therapy, the Employee offered to manipulate UC-2's penis until he ejaculated, which UC-2 declined. UC-2 paid for the services in AAPD marked bills.

8. On or about January 8, 2024, at approximately 1:35 p.m., UC-1 conducted an undercover operation at the Spa and received massage therapy from the Owner. During the massage therapy, the Owner suggested that UC-1 masturbate while she continued with the massage, but UC-1 declined. UC-1 paid for the services in AAPD marked bills.

9. On or about March 12, 2024, UC-1 conducted another undercover operation at the Spa. UC-1 entered the Spa and was greeted by the Respondent. After paying \$70 in cash for the massage, UC-1 was ushered to a massage room where he undressed completely and lay on the massage table face down. The Respondent performed massage on UC-1's body, initially with a drape over his mid-section but later removed it with UC-1's buttocks exposed.

10. Next, the Respondent had UC-1 lay on his back with a drape over his genitals. While performing massage on UC-1's body, the Respondent lifted the drape and encouraged UC-1 to masturbate. When UC-1 asked the Respondent to manipulate his genitals, the Respondent laughed and declined. UC-1 declined to masturbate, and the Respondent completed the massage therapy.

11. At the massage therapy session on or about March 12, 2024, the Respondent failed to conduct an evaluation and assessment of UC-1 prior to or after the massage. The Respondent also failed to maintain any written record of the massage session, including information required to be maintained under State regulations.

12. On or about April 26, 2024, UC-1 conducted another undercover operation at the Spa. At approximately 12:21 p.m., UC-1 entered the Spa and was greeted by the Respondent. UC-1 requested a massage, and the Respondent pointed UC-1 to a massage room. The Employee then followed UC-1 into the massage room, at which time UC-1 paid the Employee in AAPD marked bills. The Employee left the massage room to allow UC-1 to undress. The Employee later re-entered the massage room and performed massage on

UC-1. Approximately 30 minutes into the massage, the Employee offered to manipulate UC-1's penis until he ejaculated for an agreed price, which UC-1 declined.

13. Approximately 10 minutes later, on or about April 26, 2024, UC-2 entered the Spa and was greeted by the Respondent. After paying \$70 in cash for the massage, UC-2 was ushered to a massage room where he undressed completely and lay on the massage table face down. The Respondent performed massage on UC-2's body, initially with a drape over his mid-section but later removed it with UC-2's buttocks exposed.

14. Next, the Respondent had UC-2 lay on his back with a drape over his genitals. While performing massage on UC-2's body, the Respondent lifted the drape and encouraged UC-2 to masturbate. When UC-2 asked the Respondent to manipulate his genitals, the Respondent declined. UC-2 declined to masturbate, and the Respondent completed the massage therapy.

15. At the massage therapy session on or about April 26, 2024, the Respondent failed to conduct an evaluation and assessment of UC-2 prior to or after the massage. The Respondent also failed to maintain any written record of the massage session, including information required to be maintained under State regulations.

B. Board Interviews

16. On or about May 12, 2024, Board staff conducted an interview of Individual 1 under oath. Individual 1 stated during the interview that he obtained the license in 2017 and helped the Owner open the Spa in early 2020. Individual 1 stated that he worked part-time as a massage practitioner at the Spa until March of 2021 and had not worked there since.

17. On or about May 12, 2024, Board staff conducted an interview of the Respondent under oath. During the interview, the Respondent stated that she started working at the Spa in February 2024, after the Owner contacted her. The Respondent stated that the Owner and the Employee were the only other individuals working at the Spa and that she had never seen a male massage therapist there. The Respondent stated that the Owner paid her in cash.

C. Criminal Prosecution of the Owner

18. On or about February 21, 2024, the Owner was charged with practicing massage therapy on or about January 8, 2024, without a license in the District Court of Maryland for Anne Arundel County. On or about September 10, 2024, the Owner pleaded guilty to the sole charge and received probation before judgment.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Board concludes as a matter of law that the Respondent's actions, as described above, constitute violations of Health Occ. 6-308(a)(2) – fraudulently or deceptively using a license; (8) – doing an act that is inconsistent with generally accepted professional standards in the practice of massage therapy; (20) – engaging in conduct that violates the professional code of ethics; and (21) – knowingly doing an act that has been determined by the Board to be a violation of the Board's regulations.

The Respondent's violations of the professional code of ethics and Board's regulations include violations of: COMAR 10.65.01.08D; COMAR 10.65.03.03A; COMAR 10.65.03.03C(2), (5), (6) and/or (8)(a), (b) and/or (c); COMAR

10.65.03.03D(2)(a), (b), (c) and/or (d); and/or (6); COMAR 10.65.03.04A(1), (4), (5) and/or (7); COMAR 10.65.03.05A(1) and/or (2); COMAR 10.65.03.05B(1), (2), (3)(b) and/or 3(d); COMAR 10.65.03.06D(1), (2), (3) and/or (5); and/or COMAR 10.65.06.01A, B(1), (2), (3), (4), (5)(a), (5)(b) and/or (5)(c).

ORDER

It is, on the affirmative vote of a majority of the Board, hereby:

ORDERED that the Respondent's registration to practice massage therapy in the State of Maryland be and hereby is **SUSPENDED** for a period of **SIXTY (60) DAYS** to commence on the effective date of this Consent Order. During the period of suspension, the Respondent's status as a registered massage practitioner will be listed in the Board's computer and website as being "suspended" and the Respondent shall not use her Maryland massage practitioner registration to:

1. Practice massage therapy;
2. Take any actions after the effective date of this Order to hold himself or herself out to the public as a current provider of massage therapy services;
3. Authorize, allow or condone the use of the Respondent's name or provider number by any health care practice or any other licensee or health care provider; or
4. Perform any other act that requires an active massage therapy registration.

AND IT IS FURTHER ORDERED that the Respondent shall not apply for early termination of suspension; and it is further

ORDERED that after the sixty (60) day period of suspension imposed by this Consent Order has passed, the Respondent is placed on **PROBATION** for a minimum

period of **TWO (2) YEARS**. During the probationary period, the Respondent shall comply with the following terms and conditions are met:

1. The Respondent's status as a registered 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 Consent 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.
 - 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
3. Within thirty **30 DAYS** of the effective date of this Consent Order, the Respondent shall pay a fine in the amount of **ONE THOUSAND FIVE-HUNDRED DOLLARS (\$1,500)** by bank certified check or money order made payable to the Maryland State Board of Massage Therapy Examiners.

AND IT IS FURTHER ORDERED that after the conclusion of the entire **TWO (2) YEAR** period of probation, 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 Respondent may be required to appear before the Board or a committee of the Board to discuss her petition for termination. The Board will grant the petition to terminate the probation if the Respondent has complied with all of the probationary terms and conditions and there are no pending complaints involving similar violations found in this case before the Board; 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 Respondent shall be given an evidentiary hearing before the Board; and if the Board determines there is no genuine dispute as to a material fact, the Respondent shall be given 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, place the Respondent on probation with appropriate terms and conditions, or suspend with appropriate terms and conditions, or revoke the Respondent's registration 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 on the Respondent; and it is further

ORDERED that the Respondent is responsible for all costs incurred in fulfilling the terms and conditions of this Consent Order; 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 Consent Order. The Respondent's failure to fully cooperate with the Board shall be considered a violation of probation of this Consent Order; and it is further

ORDERED that unless stated otherwise in this Consent any time prescribed in this Consent Order begins when the Consent Order goes into effect. This Consent 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 this Consent Order is a public document pursuant to Md. Code Ann., Gen. Prov. § 4-333(b)(6) and Md. Code Ann., Health Occ. § 1-607.

10/14/2025
Date

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

CONSENT

I, Haihua Zheng, RMP, acknowledge that I am represented by counsel and have consulted with counsel before entering into this Consent Order. By this Consent and for

the purpose of resolving the issues raised by the Board, I agree and accept to be bound by the foregoing Consent Order and its conditions.

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 provided by the law. I agree to forego my opportunity to challenge these allegations. I acknowledge the legal authority and jurisdiction of the Board to initiate these proceedings and to issue and enforce this Consent Order. I affirm that I am waiving my right to appeal any adverse ruling of the Board that might have followed after any such hearing.

I sign this Consent Order after having an opportunity to consult with counsel, voluntarily and without reservation, and I fully understand and comprehend the language, meaning and terms of this Consent Order.

10/5/2025
Date

Haihua Zheng
Haihua Zheng, RMP
Respondent

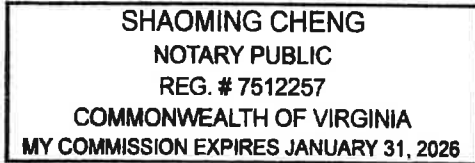
NOTARY

Virginia
STATE OF ~~MARYLAND~~
CITY/COUNTY OF Fairfax

I HEREBY CERTIFY that on this 5th day of October,
2025, before me, a Notary Public of the foregoing State and City/County personally appear

Haihua Zheng, RMP, and made oath in due form of law that signing the foregoing Consent Order was her voluntary act and deed.

AS WITNESSETH my hand and notary seal.





Notary Public

My commission expires: 1/31/2026