

IN THE MATTER OF
MEGAN CARMON, LMT

Respondent

License Number: M06610

*** BEFORE THE MARYLAND**
*** STATE BOARD OF MASSAGE**
*** THERAPY EXAMINERS**
*** Case Number: 25-07M**

* * * * *

CONSENT ORDER

On April 23, 2025, the Maryland State Board of Massage Therapy Examiners (the “Board”) charged **MEGAN CARMON**, Licensed Massage Therapist, License Number **M06610** (the “Respondent”), with violating the Maryland Massage Therapy Act (the “Act”), Md. Code Ann., Health Occ. §§ 6-101 *et seq.*

On May 28, 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 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 State and the Respondent jointly proposed resolving the charges with a public consent order containing the terms and conditions contained herein.

FINDINGS OF FACT

I. Licensure and Employment

1. The Respondent was initially authorized to practice massage therapy in the State of Maryland on or about March 8, 2013 as a Registered Massage Practitioner

(“RMP”)¹ under registration number R01742. On or about April 1, 2024, the Respondent’s RMP registration was converted to a Licensed Massage Therapist (“LMT”)² license, license number M06610. The Respondent’s license is active and current through October 31, 2026.

2. At all times relevant, the Respondent owned and operated a business in Rosedale, Maryland that offers massage therapy and skin care services (the “Company”).³

3. On February 28, 2024, the Respondent / the Company entered into an employment agreement with her husband (the “Employee”) in which the parties agreed, *inter alia*, that the Respondent / the Company “shall employ [the Employee] as a Massage Therapist on a part-time basis of up to 20 hours per week.”

4. The Employee was initially authorized to practice massage therapy in the State of Maryland on or about April 16, 2013. The Employee’s LMT license, license number M05580, expired on October 31, 2016. On or about March 26, 2024, the Board received an Application for License or Registration in Massage Therapy submitted by the Employee. The current status of the Employee’s license is “non-renewed.”

¹ In Maryland, a Registered Massage Practitioner 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 is “an individual who is licensed by the Board to practice massage therapy.” COMAR 10.65.01.04(B)(5).

³ The names of individuals and facilities are confidential.

II. Board Complaints

5. On or about March 20, 2024, the Board received a complaint (“Complaint 1”) filed by an individual (“Complainant 1”) who reported that she was considering booking a massage appointment with one of the Company’s employees, the Employee, until she attempted to verify the Employee’s Maryland license and learned that the license was not current and had not been renewed since 2016. Complainant 1 attached screenshots from the Company’s website, including a screenshot of the Employee’s profile which stated, *inter alia*, “[The Employee] is one of our talented Massage Therapists. He started at [the Company] in March of 2024. He graduated from [an educational institute] in 2012. He has been a licensed, practicing Massage Therapist for 5 years.”

6. On April 16, 2024, the Board received a second complaint (“Complaint 2”) from another individual (“Complainant 2”) who reported that she was considering booking a massage appointment with the Employee until she attempted to verify the Employee’s license and learned that the Employee has not held a current Maryland license since October 31, 2016. Complainant 2 also reported that “the information [the Company] provided indicated that [the Employee] had been practicing for 5 years and that he began working for them since March of 2024.”

III. Board Investigation

7. The Board conducted an investigation of the Employee (under Case Number 24-23M) and the Respondent (under Case Number 25-07M). As part of its investigation,

the Board, *inter alia*, obtained records from the Company, obtained written statements from two clients of the Company, and interviewed the Employee and the Respondent under oath.

The Board's investigation revealed:

8. In March 2024, the Respondent, who was aware that the Employee's Maryland license had been in non-renewed status since October 2016, advertised on the Company's website that the Employee "has been a licensed, practicing Massage Therapist for 5 years." In April 2024, the Employee, while acting in his professional capacity as an employee of the Respondent, provided massage therapy services to at least eleven clients. Though the Employee and the Respondent deny that the Employee was compensated for his services as a massage therapist, the Company's records show that at least five clients paid the Company for massages performed by the Employee in April 2024.

9. During a recorded interview with the Board's Investigator on September 9, 2024, the Respondent stated under oath, *inter alia*, that:

- a. She hired the Employee as a massage therapist in February 2024. She was aware that the Employee's Maryland license was non-renewed.
- b. Between April 2, 2024 and April 20, 2024, the Employee saw a total of eleven clients.
- c. The Employee told the clients that his license was in a non-renewed status.
- d. The Employee was not paid for his services as a massage therapist. He was paid for two days of training and six days working as a spa back.

10. The Company's appointment book records show that the Employee provided massage therapy services to eleven clients between April 2, 2024 and April 20, 2024.

11. On or about December 3, 2024, the Board issued a *subpoena duces tecum* to the Respondent for the Company's records relating to five of the eleven clients whom the Employee massaged in April 2024. The Company's records sent in response revealed that:

- a. Client 3 paid \$90 for a 60-minute massage performed by the Employee on April 5, 2024. She tipped \$18 for the massage.
- b. Client 5 paid \$108 for a 60-minute massage performed by the Employee on April 14, 2024. He tipped \$18 for the massage.
- c. Client 6 paid the Company \$130 for a 90-minute massage performed by the Employee on April 14, 2024. He tipped \$26 for the massage.
- d. Client 8 paid the Company \$90 for a 60-minute massage performed by the Employee on April 18, 2024. He tipped \$18 for the massage.
- e. Client 9 paid the Company \$130 for a 90-minute massage performed by the Employee on April 19, 2024. He tipped \$30 for the massage.

12. On December 11, 2024, the Board's Investigator sent questionnaires to the five clients for whom the Board previously obtained the Company's records. The Board received responses from two clients:

- a. Client 3 confirmed that the Employee massaged her on April 5, 2024, that she was not notified that the Employee did not have an active license, and that she paid for the massage using a credit card.
- b. Client 6 confirmed that the Employee massaged him on April 14, 2024, that he was not notified that the Employee did not have an active license, and that he paid for the massage using a credit card.

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 provisions⁴:

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

- (a) *In general; grounds.* -- 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;
 - (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.

COMAR 10.65.03.03 Code of Ethics – Standards of Practice (2017).

C. A license holder or registration holder shall:

- (8) Report to the Board of Massage Therapy Examiners, or other appropriate authority, conduct in the practice of massage therapy⁵ that indicates a violation of:

⁴ The statutory and regulatory provisions cited in this Order reflect the versions which were in effect at the time of the April 2024 conduct at issue in this matter. The charges issued in this matter, however, cited recently updated versions which went into effect after the conduct at issue. The Respondent acknowledges that the statutory and regulatory provisions in this Order differ from those cited in the Charges, and enters this Consent Order in agreement with that change.

⁵ Per COMAR 10.65.01.04(B)(9), “[p]ractice massage therapy” means to engage professionally and for compensation in massage therapy.”

- (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:

- (1) Misrepresent professional credentials, qualifications, education, or affiliations;
- (6) Aid or abet any individual violating or attempting to violate any provision of law or regulation.

To wit: Health Occ. § 6-501 (2022): 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.⁶

COMAR 10.65.04.03 Advertising (2017).⁷

D. An advertisement may not include statements that:

- (1) Contain misrepresentations of facts;
- (7) Misrepresent any professional qualifications, education, experience, or affiliation[.]

⁶ Per Health Occ. § 6-101(g) (2023), “[p]ractice massage therapy’ means to engage professionally and for compensation in massage therapy.”

⁷ Per COMAR 10.65.04.05 Advertising – Accountability (2017), “A license holder or registration holder shall be accountable under this chapter if the license holder or registration holder uses an agent, partnership, professional association, health maintenance organization, or any other entity or means to implement actions prohibited by this chapter.”

ORDER

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

ORDERED that Respondent's license to practice massage therapy in the State of Maryland, License Number **M06610**, is **REPRIMANDED**; and it is further

ORDERED that the Respondent's license is placed on **PROBATION** for a minimum of **ONE (1) YEAR**, 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 take and successfully complete a live (not pre-recorded) Board-approved course 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 course before the course begins;
 - ii. The Board may accept a course taken in person or online;
 - iii. The course must be a minimum of three credit hours.
 - iv. The Respondent must provide documentation to the Board that the Respondent successfully completed the course;
 - v. The course may not be used to fulfill the continuing education credits required for license renewal; and
 - vi. The Respondent is responsible for the cost of the course;
3. The Respondent shall submit to random record reviews conducted by Board staff and/or Board-approved reviewers throughout the term of probation;

4. The Respondent shall allow random quarterly onsite inspections by Board staff and/or Board-approved inspectors;
5. 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
6. 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.

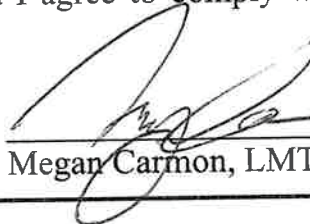
06/25/2025
Date

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.

05/30/2025
Date



Megan Carmon, LMT

STATE OF MARYLAND
CITY/COUNTY OF ANNE ARUNDEL

I HEREBY CERTIFY that on this 30th day of May, 2025, before me, a Notary Public of the State of Maryland and City/County aforesaid, personally appeared Megan Carmon, 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.

MEEM AHSAN
NOTARY PUBLIC
ANNE ARUNDEL COUNTY
MARYLAND
My Commission Expires Oct. 26, 2026


Notary Public
My Commission Expires: 10/26/26