

IN THE MATTER OF	*	BEFORE THE MARYLAND
WANVALEE ROYALTY, LMT	*	STATE BOARD OF MASSAGE
Respondent	*	THERAPY EXAMINERS
License Number: M06706	*	Case Number: 26-08M

* * * * *

CONSENT ORDER

Based on an investigation conducted by the Maryland State Board of Massage Therapy Examiners (the “Board”), the Board has grounds to charge **WANVALEE ROYALTY, LMT**, (the “Respondent”), License Number M06706, with violating the Maryland Massage Therapy Act (the “Act”), Md. Code Ann., Health Occupations (“Health Occ.”) §§ 6-101 *et seq.* (2021 Repl. Vol. and 2025 Supp.). Prior to the issuance of disciplinary charges, the Respondent agreed to enter into this public Consent Order, which consists of Findings of Fact, Conclusions of Law and Order.

The pertinent provisions of the Act and Md. Code Regs (“COMAR”) provide:

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;
 - (9) Is negligent 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.

D. A licensee may not:

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

FINDINGS OF FACT

The Board makes the following Findings of Fact:

1. At all times relevant, the Respondent was and is licensed to practice massage therapy in the State of Maryland. The Respondent was initially licensed to practice massage therapy in the State of Maryland on or about October 9, 2020 under License Number M06706. The Respondent's license to practice massage therapy is active through October 31, 2026, subject to renewal.

2. At all times relevant, the Respondent owned and operated a business in Montgomery County, Maryland that offered massage therapy and other spa services (the “Establishment”).¹

3. On or about April 11, 2025, the Board received a complaint alleging that an employee (the “Employee”) working at the Establishment “may not be licensed to practice massage therapy in the state.” The complainant alleged that her husband received massages from the Employee beginning in 2024.

¹ For confidentiality and privacy reasons, the names of individuals and facilities are not disclosed in this document.

4. Based on the initial Complaint the Board opened an investigation. In the course of its investigation, the Board initiated a complaint against the Respondent for employing an unlicensed individual to practice massage therapy in Maryland.

5. On June 30, 2025, the Board issued a *subpoena duces tecum* to the Establishment requesting employee records from June 1, 2024 through April 23, 2025. In response, the Respondent provided the Board eight (8) independent contractor agreements and related W-9 documentation.

6. The Respondent's response included an Independent Contractor Agreement ("the Agreement") for the Employee dated July 30, 2022. The Agreement stated "[the Employee] shall perform massage and related services." The Agreement also outlined the Employee's compensation structure.

7. On August 18, 2025, the Board issued a *subpoena duces tecum* for the Establishment's appointment book for October 1, 2024 through June 30, 2025. The Respondent provided the appointment book which showed the Employee's name listed as performing sixty-minute and ninety-minute "combination" massages on various dates throughout 2024 - 2025.

8. The Employee is not licensed by the Maryland State Board of Massage Therapy Examiners to practice massage therapy in Maryland.

9. On October 1, 2025, the Board's Investigator interviewed the Respondent in the presence of her counsel and the assistance of a certified language interpreter. The Respondent stated that the Employee worked at the Establishment from July 2022 until

March 2025 when she resigned. The Respondent stated that the Employee was “not a masseuse” and only performed “body work.”²

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 doing an act that is inconsistent with generally accepted professional standards in the practice of massage therapy, in violation of Health Occ. § 6-308(a)(8); being negligent in the practice of massage therapy, in violation of § 6-308(a)(9); engaging in conduct that violates the professional code of ethics, *i.e.* COMAR 10.65.03.03D6, in violation of § 6-308(a)(20); and knowingly doing an act that has been determined by the Board to be a violation of the Board’s regulations, *i.e.* COMAR 10.65.0303D6, in violation of § 6-308(a)(21).

ORDER

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

ORDERED that the Respondent, license number **M06706**, is placed on **PROBATION** for **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 take and successfully complete a live (not

² Montgomery County Code 24-11-B defines “Bodywork” as the practice of using one’s hands or another part of the body to apply pressure on an individual’s fully clothed body or bare feet to affect the electromagnetic energy, energetic field, or energy meridians of the human body. Bodywork includes the practice of reflexology or acupressure.

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 allow random quarterly onsite inspections by Board staff and/or Board-approved inspectors;
 4. 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
 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 this Consent Order. The Respondent's failure to fully cooperate with the Board shall be considered a violation of probation and this Consent 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 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 the effective date of the 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 Consent 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.

03/25/2026
Date

Signature on File
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, Wanvaley Royalty, waive my right to contest the charges in an evidentiary hearing, and I voluntarily agree to be bound by the foregoing Order.
2. I acknowledge the validity of this 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 Order.
4. I waive any right to contest the Findings of Fact, Conclusions of Law, and terms and conditions of this 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 Order 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.

03/10/2026
Date

Signature on File _____
Wanvaley Royalty , LMT

NOTARIZATION

STATE OF MARYLAND
CITY/COUNTY OF _____

I HEREBY CERTIFY that on this _____ day of _____, 2026,
before me, a Notary Public of the State of Maryland and City/County aforesaid, personally
appeared Wanvalee Royalty, and made an 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.

Seal

Signature on File
Notary Public

My Commission Expires: _____