



State of Arizona  
Governor  
Janice K. Brewer

## Arizona State Board of Massage Therapy

1400 W. Washington, Ste. 300 ♦ Phoenix, AZ 85007  
Voice Telephone: 602-542-8604 ♦ Fax: 602-542-8804  
Website: [www.massageboard.az.gov](http://www.massageboard.az.gov) ♦ Kathleen Phillips, Executive Director

May 12, 2014

Joseph E. Collins  
3241 East Shea Boulevard, Suite 1  
Phoenix, AZ 85028

Re: Wouters Rehearing or Review

Dear Mr. Collins:

The Board of Massage Therapy (Board) issued an order revoking Mr. Wouter's license at its March 24, 2014 Board meeting. On March 26, 2014, Board staff mailed Mr. Wouters an order stating that he had 35 days from the date of the Board's mailing to request a rehearing or review if the order was sent by certified mail. On May 7, the Board received your request for rehearing or review, which stated that it was mailed on May 5. Because the request was not filed timely, it will not be considered. Filing a late request for rehearing or review is an absolute bar. See A.R.S. § 41-1092.09; A.A.C. R4-15-401.

If you have any questions, I can be reached at the number above.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Phillips".

Kathleen Phillips  
Executive Director

Cc: Elizabeth Campbell  
Assistant Attorney General

1 JOSEPH E. COLLINS, Bar No. 018289  
2 COLLINS & COLLINS L.L.P.  
3 3241 East Shea Blvd., Suite 1  
4 Phoenix, Arizona 85028  
5 Tel. (602) 788-7227  
6 joecollins@collinslaw.net  
7 Attorney for Plaintiff/Petitioner

REC'D JUN 19 2014

8  
9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
10 **IN AND FOR THE COUNTY OF MARICOPA**

11 IN RE the matter of:  
12  
13 NEIL WOUTERS, LMT,  
14 Holder of License No. MT-14538  
15 As a Massage Therapist  
16 In the State of Arizona

**Board Case No. 14-101**

**NOTICE OF APPEAL FOR  
JUDICIAL REVIEW OF  
ADMINISTRATIVE DECISION**

17 Appellant,

18 v

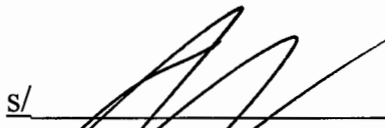
19 ARIZONA BOARD OF MASSAGE  
20 THERAPY,

21 Appellee.

22 Notice is hereby given that Appellant Cornelius Wouters, by and through his  
23 undersigned attorney, hereby appeal to the Superior Court of the State of Arizona  
24 in and for the county of Maricopa from (1) the Appellees denial of Appellants  
25 request for rehearing or reconsideration in a letter dated May 12, 2014; and (2) the  
26

1 Appellee's Order of March 24, 2014, revoking Appellants Massage Therapy  
2 License.

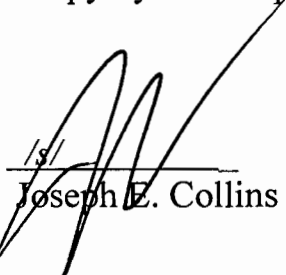
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5 Dated: June 13, 2014

6 s/ 

7 JOSEPH E. COLLINS, Bar No. 018289  
8 COLLINS & COLLINS L.L.P.  
9 3241 East Shea Blvd., Suite 1  
10 Phoenix, Arizona 85028  
11 Tel. (602) 788-7227  
12 joecollins@collinslaw.net  
13 Attorney for Appellant

14 **CERTIFICATE OF SERVICE**

15 I certify that, on June 16, 2014, I filed the  
16 ORIGINAL of the foregoing document was e-filed  
17 via the Court's Electronic Filing System and served  
18 a copy by email upon the following:

19 s/   
20 Joseph E. Collins

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## REPRESENTATION STATEMENT

Pursuant to the Superior Court rules regarding appeals, Appellant Cornelius Wouters provides the following information regarding the parties and their counsel:

Named Appellant:

Cornelius "Neil" Wouters

Counsel for Appellant:

JOSEPH E. COLLINS, Bar No. 018289  
COLLINS & COLLINS L.L.P.  
3241 East Shea Blvd., Suite 1  
Phoenix, Arizona 85028  
Tel. (602) 788-7227  
joecollins@collinslaw.net

Appellee:

Arizona Board of Massage Therapy

Counsel for Appellee:

Elizabeth Campbell, Assistant Attorney General  
Office of the Attorney General  
1275 West Washington Street  
Phoenix, AZ 85007-2926

1 Dated: June 13, 2014

2  
3  
4 s/

5 JOSEPH E. COLLINS, Bar No. 018289  
6 COLLINS & COLLINS L.L.P.  
7 3241 East Shea Blvd., Suite 1  
8 Phoenix, Arizona 85028  
9 Tel. (602) 788-7227  
10 joecollins@collinslaw.net  
11 Attorney for Plaintiff

12 **CERTIFICATE OF SERVICE**

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15 s/  
16 Joseph E. Collins



REC'D MAY 7 2014

1 COLLINS & COLLINS L.L.P.  
2 JOSEPH E. COLLINS  
3 Attorney for Plaintiff  
4 Arizona Bar # 018289  
5 3241 East Shea Blvd Suite 1  
6 Phoenix, Arizona 85028  
(602) 788-7227  
joecollins@collinslaw.net

7 BEFORE THE ARIZONA BOARD  
8 OF MASSAGE THERAPY EXAMINERS

9  
10 IN RE the matter of

Board Case No 14-101

11  
12 NEIL WOUTERS, LMT,

REHEARING OR REVIEW OF  
BOARD'S DECISION

13 Holder of License No. Mt-14538  
14 As a Massage Therapist  
15 In the State of Arizona.

16 COMES NOW Respondent a review of the boards decision dated March 26, 2014 and  
17 shows the board as follows:

18 1. The notice from the board indicates that a motion for hearing must be filed by the  
19 board 35 days after the board issues its decision if mailed. However, the decision and order does  
20 not indicate the length of time if not mailed or if time is different for personal service. This of  
21 course is not clear notice of Respondents rights and deficient. Respondent request that his request  
22 for rehearing be granted.

23 2. Respondent request that the board either modify its order, or set the matter for re-  
24 hearing as follows:

25 3. Responded was given notice of the hearing On February 14, 2014 by certified  
26 mail.

27 4. The notice requires that an anser be field within 30 days. The hearing was set for  
28 March 24, 2014 at 9:00 a.m. or Les than 45 days from the notice.

1           5.       Respondent did not commit the acts he was accused of in the complaint.

2           6.       Respondent was not given sufficient time to prepare for nor to respond to the  
3 allegations contained in the complaint accusing him of two counts of sexually assaulting his  
4 clients.

5           7.       There is no indication that the investigative file was turned over to Respondent  
6 prior to the hearing.

7           8.       Respondent would like retrieve a copy of the prior statements of the complainants  
8 to Dr. Westhesby and the police or to other individuals, which he has not had an opportunity to  
9 do and given the limited time frame has not been able to secure.

10          9.       This evidence is material evidence that could not, with reasonable diligence, have  
11 been discovered and produced at the hearing because of the short period of time from the notice  
12 of hearing and the actual hearing.


13          10.      The punishment of revocation is Excessive given the time from of the conduct and  
14 the reporting to the board.

15           Wherefore Respondent request a new hearing or that the matter be reviewed when he has  
16 sufficient time to prepare to meet the allegations against him or in the alternative for the sanction  
17 imposed to be reduced.

18           Dated and Signed this May 5, 2014

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COLLINS & COLLINS L.L.P



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JOSEPH E. COLLINS  
Attorney for Respondent

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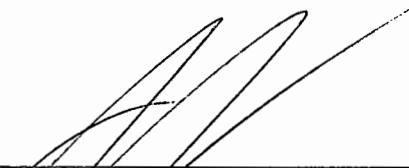
CERTIFICATE OF MAILING

THIS IS TO CERTIFY that on May 5, 2014, a true and correct copy of the foregoing was mailed, postage prepaid, to:

Arizona State Board of Massage Therapy  
1400 West Washington Suite 300  
Phoenix Arizona 85007  
**Faxed to 602-542-8804**

Christopher Munns  
Assistant Attorney General  
1275 Washington Street CIV/SGO  
Phoenix Arizona 85007

Elizabeth Campbell  
Assistant Attorney General  
1275 West Washington Street Civ/Les  
Phoenix Arizona 85007



---

JOSEPH E. COLLINS  
Attorney at Law



1 BEFORE THE ARIZONA BOARD OF MASSAGE THERAPY

2 In the Matter of:

3 )  
4 **NEIL WOUTERS, LMT** )

5 )  
6 License No. MT-14538 )

7 As a Massage Therapist )

8 In the State of Arizona )  
9

**FINDINGS OF FACT, CONCLUSIONS OF  
LAW, AND ORDER**

10 Pursuant to Notice of Hearing Number 14-101 (Notice) this matter came before the Arizona  
11 Board of Massage Therapy (Board) on March 24, 2014.

12 Dennis Beye, president, presided at the meeting with Board members Victoria Bowman, John  
13 Ortega, Earl Duskey, and Diane Pruetz in attendance.

14 The State was represented by the Office of the Attorney General, Elizabeth Campbell, Assistant  
15 Attorney General, Licensing and Enforcement Section. Chris Munns, of the Solicitor General's  
16 Section of the Attorney General's Office was present and available to provide independent legal  
17 advice to the Board. Neil Wouters (Respondent) was present and was not represented by counsel.

18 The Board, after considering the testimony and evidence presented, hereby issues the following  
19 Findings of Fact, Conclusions of Law, and Order.

20 **AUTHORITIES AND JURISDICTION**

21  
22 1. The Board is the duly constituted authority for licensing and regulating the practice of  
23 massage therapy in the state of Arizona.

24 2. Respondent is the holder of license number MT-14538, which allows him to practice as a  
25 massage therapist in the state of Arizona.

26 3. Under A.R.S. § 32-4201 et seq., the Board has jurisdiction over the subject matter and  
27 over the Respondent as a licensee of the Board.

1 **FINDINGS OF FACT**

2 1. On November 21, 2012, female massage therapy client EB received a massage from  
3 Respondent at a chiropractor's office in Phoenix, Arizona. During the massage, respondent  
4 exposed EB's genitals and touched her breasts.

5 2. On July 3, 2013, female massage therapy client BC received a massage from Respondent  
6 at a chiropractor's office in Phoenix, Arizona. During the massage, Respondent touched BC's  
7 genitals.

8 **CONCLUSIONS OF LAW**

9 1. Under A.R.S. § 32-4201 *et seq.*, the Board has jurisdiction over the subject matter and  
10 over the Respondent as a licensee of the Board.

11 2. The Board may discipline a massage therapist who has engaged in sexual activity with a  
12 client. A.R.S. § 32-4253(A)(15)

13 3. The conduct and circumstances described above with regard to BC constitutes sexual  
14 activity in violation of A.R.S. § 32-4253(B)(2)(a). ("Sexual activity" means sexual conduct).  
15 "Sexual conduct" means any direct or indirect touching, fondling, or manipulating of any part of  
16 the genitals or anus by any part of the body or by any object or causing a person to engage in that  
17 conduct. A.R.S. § 32-4253(B)(3).

18 4. The conduct and circumstances described above with regard to EB and BC constitute  
19 sexual activity in violation of A.R.S. § 32-4253(B)(2)(c) ("Sexual activity" means making sexual  
20 advances, requesting sexual favors or engaging in other verbal conduct or physical contact of a  
21 sexual nature with a client).

22 5. The conduct and circumstances described above with regard to EB constitute sexual  
23 activity in violation of A.R.S. § 32-4253(B)(2)(d) ("Sexual activity" means intentionally viewing  
24 a completely or partially disrobed massage therapy client in the course of treatment if the  
25 viewing is not related to treatment under current practice standards and is intended to appeal to  
26 the prurient interest of the massage therapy client or the massage therapist.

1 6. The conduct and circumstances described above with regard to EB constitute sexual  
2 activity in violation of A.R.S. § 32-4253(B)(2)(e) ("Sexual activity" means massaging, touching  
3 or applying any instrument or device by a licensee in the course of practicing or engaging in  
4 massage therapy to the breasts of a female client unless the client requests breast massage and  
5 signs a written consent.).

6 **ORDER**

7  
8 Based on the foregoing Findings of Fact and Conclusions of Law, **IT IS HEREBY ORDERED**  
9 that Respondent's license number **MT-14538** is **REVOKED**.

10 **RIGHT TO PETITION FOR REHEARING OR REVIEW**

11 Respondent has the right to petition for a rehearing or review of this Order. Pursuant to A.R.S. §  
12 41-1092.09 and A.A.C. R4-15-401(A), the petition must be filed with the Board within thirty-  
13 five (35) days from the date of mailing if the Order was served by certified mail. The petition  
14 must set forth legally sufficient reasons for granting the rehearing or review pursuant to A.A.C.  
15 R4-15-401(C). The timely filing of a motion for rehearing or review shall stay the enforcement  
16 of the Board's Order. If a motion for rehearing or review is not filed, the Board's Order becomes  
17 effective thirty-five (35) days after it is mailed, unless pursuant to A.A.C. R4-15-401(F), the  
18 Board has expressly found good cause to believe that this Order shall be effective immediately  
19 upon the issuance and has so stated in this Order. The failure to file a motion for rehearing or  
20 review within thirty days after service of the decision has the effect of prohibiting the parties  
21 from seeking judicial review of the Board's decision.

22 Dated and signed this 26<sup>th</sup> day of March, 2014.

23 ARIZONA BOARD OF MASSAGE THERAPY

24 By:   
25 Kathleen Phillips  
26 Executive Director  
27

1 ORIGINAL OF THE FOREGOING FILED

2 this 26<sup>th</sup> day of March, 2014 with the:

3 Arizona State Board of Massage Therapy

4 1400 West Washington, Suite 300

5 Phoenix, AZ 85007

6  
7 EXECUTED COPY OF THE FOREGOING MAILED

8 BY CERTIFIED & REGULAR FIRST-CLASS MAIL

9 this 26<sup>th</sup> day of March, 2014, to:

10  
11 Neil Wouters

12 Address of Record

13 Respondent/Licensee

14  
15 COPY OF THE FOREGOING MAILED

16 this 26<sup>th</sup> day of March, 2014

17  
18 Christopher Munns

19 Assistant Attorney General

20 1275 W. Washington Street, CIV/SGO

21 Phoenix, Arizona 85007

22 Attorney for the Board

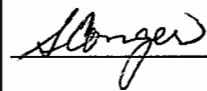
23  
24 Elizabeth Campbell

25 Assistant Attorney General

26 1275 W. Washington Street, CIV/LES

27 Phoenix, Arizona 85007

28 Attorney for the State

29  
30   
31 \_\_\_\_\_

1 JOSEPH E. COLLINS, Bar No. 018289  
2 COLLINS & COLLINS L.L.P.  
3 3241 East Shea Blvd., Suite 1  
4 Phoenix, Arizona 85028  
5 Tel. (602) 788-7227  
6 joecollins@collinslaw.net  
7 Attorney for Plaintiff/Petitioner

8  
9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
10 **IN AND FOR THE COUNTY OF MARICOPA**

11 IN RE the matter of:

**Board Case No. 14-101**

12 NEIL WOUTERS, LMT,  
13 Holder of License No. MT-14538  
14 As a Massage Therapist  
15 In the State of Arizona

**NOTICE OF APPEAL FOR  
JUDICIAL REVIEW OF  
ADMINISTRATIVE DECISION**

16 Appellant,

17 v

18 ARIZONA BOARD OF MASSAGE  
19 THERAPY,

20 Appellee.

21 Notice is hereby given that Appellant Cornelius Wouters, by and through his  
22 undersigned attorney, hereby appeal to the Superior Court of the State of Arizona  
23 in and for the county of Maricopa from (1) the Appellees denial of Appellants  
24 request for rehearing or reconsideration in a letter dated May 12, 2014; and (2) the  
25

1 Appellee's Order of March 24, 2014, revoking Appellants Massage Therapy  
2 License.

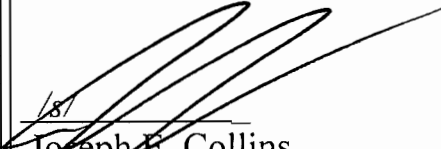
3  
4  
5 Dated: June 13, 2014

6 s/ 

7 JOSEPH E. COLLINS, Bar No. 018289  
8 COLLINS & COLLINS L.L.P.  
9 3241 East Shea Blvd., Suite 1  
10 Phoenix, Arizona 85028  
11 Tel. (602) 788-7227  
12 joecollins@collinslaw.net  
13 Attorney for Appellant

14 **CERTIFICATE OF SERVICE**

15 I certify that, on June 16, 2014, I filed the  
16 ORIGINAL of the foregoing document was e-filed  
17 via the Court's Electronic Filing System and served  
18 a copy by email upon the following:

19   
20 Joseph E. Collins

## REPRESENTATION STATEMENT

Pursuant to the Superior Court rules regarding appeals, Appellant Cornelius Wouters provides the following information regarding the parties and their counsel:

Named Appellant:

Cornelius "Neil" Wouters

Counsel for Appellant:

JOSEPH E. COLLINS, Bar No. 018289  
COLLINS & COLLINS L.L.P.  
3241 East Shea Blvd., Suite 1  
Phoenix, Arizona 85028  
Tel. (602) 788-7227  
joecollins@collinslaw.net


Appellee:

Arizona Board of Massage Therapy

Counsel for Appellee:


Elizabeth Campbell, Assistant Attorney General  
Office of the Attorney General  
1275 West Washington Street  
Phoenix, AZ 85007-2926

1 Dated: June 13, 2014

2  
3  
4   
5 JOSEPH E. COLLINS, Bar No. 018289  
6 COLLINS & COLLINS L.L.P.  
7 3241 East Shea Blvd., Suite 1  
8 Phoenix, Arizona 85028  
9 Tel. (602) 788-7227  
10 joecollins@collinslaw.net  
11 Attorney for Plaintiff

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15 via the Court's Electronic Filing System and served  
16 a copy by email upon the following:

17   
18 \_\_\_\_\_  
19 Joseph E. Collins