

1 **BEFORE THE STATE OF NEVADA**
2 **BOARD OF APPLIED BEHAVIOR ANALYSIS**

3
4 IN THE MATTER OF

5 CHASON ROBINSON, LBA
6 License No. LBA0900

7 Respondent.

Case No. NV01LBA25

8 **CONSENT DECREE**

9 The State of Nevada Board of Applied Behavior Analysis (BOARD) having
10 jurisdiction over CHASON ROBINSON ("RESPONDENT"), License No. LBA0900,
11 pursuant to NRS 641D.250; an accusation against said licensee having been received
12 alleging violations of the Nevada statutes and regulations controlling the practice as a
13 behavior analyst; and the parties being mutually desirous of settling the controversy
14 between them relative to the pending accusation;

15 IT IS HEREBY STIPULATED AND AGREED between the undersigned parties that
16 this matter shall be settled and resolved upon the following terms:

17 **JURISDICTION**

18 RESPONDENT acknowledges the BOARD has jurisdiction over him and the conduct
19 that has precipitated this Consent Decree. RESPONDENT acknowledges that the BOARD
20 has the legal power and authority to take disciplinary action, including, but not limited to,
21 the revocation of his license to practice as a behavior analyst in Nevada.

22 RESPONDENT acknowledges that the BOARD will retain jurisdiction over this
23 matter until all terms and conditions set forth in this Consent Decree have been met to the
24 satisfaction of the BOARD.

25 **PUBLICATION OF CONSENT DECREE**

26 RESPONDENT acknowledges that at the time this Consent Decree becomes
27 effective, it also becomes a public document and will be reported to the State of Nevada,
28 Legislative Council Bureau, Disciplinary Action Reporting System; the Behavior Analyst

1 Certification Board, Inc. ("BACB"), and such other national databases as required by law.
2 It is also understood that any meeting during which the BOARD considers and accepts or
3 rejects this Consent Decree is open to the public and that the minutes of the BOARD
4 meeting are a public document, available for inspection by any person so requesting.

5 VOLUNTARY WAIVER OF RIGHTS

6 RESPONDENT is aware of, understands, and has been advised of the effect of this
7 Consent Decree, which he has carefully read and fully acknowledges. RESPONDENT has
8 had the opportunity to consult with competent counsel of his choice.

9 RESPONDENT has freely and voluntarily entered into this Consent Decree and he
10 is aware of his rights to contest terms set forth in the Consent Decree. These rights include
11 representation by an attorney at his own expense, the right to file an answer in response
12 to a formal complaint, the right to a public hearing on any allegations formally filed, the
13 right to confront and cross-examine witnesses called to testify against him, the right to
14 present evidence on his own behalf, the right to testify on his own behalf, the right to receive
15 written findings of fact and conclusions of law supporting the decision on the merits of the
16 Complaint and the right to obtain judicial review of the decision. All of these rights are
17 being voluntarily waived by RESPONDENT in exchange for the Board's acceptance of this
18 Consent Decree.

19 If the Consent Decree is not accepted by the BOARD, no member of the BOARD will
20 be disqualified from further hearing of this matter, by reason of his or her consideration of
21 the Consent Decree and RESPONDENT hereby waives any claim of bias or prejudice based
22 upon said consideration by any member of the BOARD in any subsequent disciplinary
23 hearing conducted by the BOARD.

24 CONTINGENCY

25 By signing the Consent Decree, RESPONDENT understands and agrees that he may
26 not withdraw his agreement or seek to rescind the Consent Decree.

27 The parties understand and agree that facsimile copies of this Consent Decree,
28 including facsimile signatures thereto, shall have the same force and effect as the originals.

1 This Consent Decree is intended to be an integrated writing representing the
2 complete, final, and exclusive embodiment of their agreement. It supersedes any and all
3 prior or contemporaneous agreements, understandings, discussions, negotiations, and
4 commitments (written or oral).

5 INDEMNIFICATION

6 RESPONDENT, for himself, his heirs, executors, administrators, successors and
7 assigns, hereby indemnifies and holds harmless the State of Nevada, the BOARD, the
8 Nevada Attorney General's office and each of their members, agents and employees in their
9 individual and representative capacities against any and all claims, suits, demands,
10 actions, debts, damages, costs, charges, and expenses, including court costs and attorney's
11 fees against any persons, entities, as well as all liability, losses, and damages of any nature
12 whatsoever that the persons and entities named in this paragraph shall have or may at
13 any time sustain or suffer by reason of this investigation, this disciplinary action, this
14 settlement or its administration.

15 STIPULATED FACTS AND CONCLUSIONS OF LAW

16 RESPONDENT understands the nature of the allegations under consideration by
17 the BOARD. He acknowledges that the conduct described below constitutes violations of
18 the Applied Behavior Analysis Practice Act (NRS and NAC 641D). He acknowledges that
19 if this matter were to be taken to a disciplinary hearing before the BOARD, the following
20 allegations could be proven by a preponderance of the evidence and that by acknowledging
21 the same, he is subject to disciplinary action by the BOARD.

22 1. RESPONDENT was a duly licensed behavior analyst in the State of Nevada
23 at all times relevant to this Complaint.

24 2. A Complaint was received by the BOARD on or about June 17, 2025.

25 3. It is alleged that on or about June 13, 2025, complainant received numerous
26 complaints that RESPONDENT was sexually harassing several registered behavior
27 technicians (RBT) under his leadership and supervision, as well as other employees, both
28 physically and verbally through text messages and social media.

1 4. That the foregoing facts constitute grounds for initiating disciplinary action
2 pursuant to NRS 641D.700.

3 5. This conduct violated NRS 641D.700(1)(g) which states that the Board may
4 suspend or revoke a person's license as a behavior analyst or assistant behavior analyst or
5 registration as a registered behavior technician, place the person on probation, require
6 remediation for the person or take any other action specified by regulation if the Board
7 finds by a preponderance of the evidence that the person has violated a regulation adopted
8 by the Board.

9 6. This conduct violated NRS 641D.700(1)(j) which states that the Board may
10 suspend or revoke a person's license as a behavior analyst or assistant behavior analyst or
11 registration as a registered behavior technician, place the person on probation, require
12 remediation for the person or take any other action specified by regulation if the Board
13 finds by a preponderance of the evidence that the person has violated or attempted to
14 violate, directly or indirectly, or assisted in or abetted the violation of or conspired to violate
15 a provision of this chapter, including, without limitation, subsection 4 of NRS 641D.600.

16 7. This conduct violated NRS 641D.600(4) which states that a licensed behavior
17 analyst or assistant behavior analyst or registered behavior technician shall comply with
18 any applicable requirements concerning ethics prescribed by the Behavior Analyst
19 Certification Board, Inc., or its successor organization.

- 20 a. BACB Code of Ethics 1.09- Non Harassment;
21 b. BACB Code of Ethics 1.11 Multiple Relationships;
22 c. BACB Code of Ethics 1.13 Coercive and Exploitive Relationships;
23 d. BACB Code of Ethics 1.14 Romantic & Sexual Relationships; and
24 e. BACB Code of Ethics 4.04 Accountability in Supervision.

25 8. That the foregoing facts constitute grounds for initiating disciplinary action
26 pursuant to NRS 641D.700.

27 9. Nevada Revised Statute NRS 641.D.720 provides:

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1 1. If the Board or a hearing officer appointed by the
2 Board finds a person guilty in a disciplinary proceeding, the
Board may:

3 (a) Administer a public reprimand.

4 (b) Limit the person's practice.

5 (c) Suspend the person's license or registration for a
6 period of not more than 1 year.

7 (d) Revoke the person's license or registration.

8 (e) Impose a fine of not more than \$5,000.

9 (f) Revoke or suspend the person's license or
registration and impose a monetary penalty.

10 (g) Suspend the enforcement of any penalty by
11 placing the person on probation. The Board may revoke the
probation if the person does not follow any conditions imposed.

12 (h) Require the person to submit to the supervision of
13 or counseling or treatment by a person designated by the Board.
The person named in the complaint is responsible for any
14 expense incurred.

15 (i) Impose and modify any conditions of probation for
16 the protection of the public or the rehabilitation of the
probationer.

17 (j) Require the person to pay for the costs of
remediation or restitution.

18 2. The Board shall not administer a private reprimand.

19 3. An order that imposes discipline and the findings of
20 fact and conclusions of law supporting that order are public
21 records.

22 STIPULATED ADJUDICATION

23 RESPONDENT stipulates that pursuant to the authority of NRS 641D.720,
24 RESPONDENT agrees that his LBA License No. 0900 shall be placed on probation for a
25 period of two (2) years, pursuant to the following terms and conditions:

26 1. Within forty-five (45) days of BOARD approval and execution of the Consent
27 Decree, RESPONDENT shall pay the BOARD one thousand two hundred nine and 21/100
28 dollars (\$1,209.21) in attorney's fees and costs and one thousand dollars (\$1,000) in an

1 administrative fine within twelve (12) months from the date of the fully executed consent
2 decree. RESPONDENT may pay the above-stated fees by way of a payment plan prepared
3 by the Board, on the condition that the payment plan is set up with the Board within
4 forty-five (45) days from the date of the approval and execution of this Consent Decree.

5 a. No grace period is permitted. If a Board prepared payment plan is not
6 approved, or full payment not actually received by the BOARD on or before the forty-five
7 (45) days as indicated above, shall be construed as an event of default by RESPONDENT.

8 b. In the event of default, RESPONDENT agrees that his license number
9 LBA0900 shall be immediately suspended. The suspension of RESPONDENT's license
10 shall continue until the unpaid balance is paid in full and the suspension is subject to being
11 reported to all appropriate agencies.

12 c. RESPONDENT acknowledges that the BOARD has the legal power and
13 authority to take action against him, including instituting debt collection actions for unpaid
14 monetary assessments in this case.

15 2. RESPONDENT shall obey all federal, state and local laws, and orders of the
16 BOARD, which are not inconsistent with this Consent Decree, pertaining to the practice as
17 a behavior analyst in this State. Any and all violations shall be reported by RESPONDENT
18 to the BOARD in writing within seventy-two (72) hours.

19 3. RESPONDENT shall provide a copy of the consent decree to each employer
20 and supervisor until all requirements of the Consent Decree have been met. Said copy
21 shall be signed by each employer and supervisor and page 1 shall submitted to the BOARD
22 with signatures.

23 4. For the first year of probation, RESPONDENT is prohibited from supervising
24 any Nevada Registered Behavior Technician or Licensed Assistant Behavior Analyst.

25 5. RESPONDENT, at his own expense, shall submit to one (1) year of
26 professional supervision by a Board approved supervisor and review subjects pertaining to
27 ethics, professional conduct and boundaries. The supervisor will submit quarterly reports
28 to the Executive Director.

1 6. RESPONDENT shall take and pass the Ethics and Boundaries Assessment
2 Service ("EBAS") Essay Examination within nine (9) months from the fully executed
3 consent decree, with results sent directly to the Board.

4 7. RESPONDENT shall complete eight (8) hours of Board approved continuing
5 education courses: four (4) hours in ethics and four (4) hours in professional conduct and
6 boundaries within the first six (6) months of his probationary period. Upon successful
7 completion of the course work, RESPONDENT must send the certificates of completion to
8 the Board office within 30 days of completion of the course. The eight (8) hours of
9 continuing education courses cannot be used towards continuing education already
10 required for continued licensure as an occupational therapist by the Board.

11 8. RESPONDENT will be financially responsible for all requirements of this
12 Consent Decree, including reasonable financial assessments by the Board for the cost of
13 monitoring his compliance or carrying out the provisions of this Consent Decree.

14 9. RESPONDENT waives his right to petition for early termination and/or
15 modification of probation.

16 10. Upon completion of two (2) years of probation, RESPONDENT may apply to
17 the BOARD for termination of his probation and full reinstatement of his Behavior Analyst
18 License No. LBA0900. RESPONDENT understands that prior to terminating his probation
19 and full reinstatement of his license he must prove to the BOARD's satisfaction that he has
20 complied with all the terms and conditions of its Consent Decree. RESPONDENT shall
21 submit a written request to the BOARD for termination of his probation. Upon receipt of
22 this request, the BOARD may request additional information from RESPONDENT to
23 determine his compliance with the Consent Decree. Upon establishing RESPONDENT has
24 met all of the requirements of the Consent Decree, he may be required to meet with the
25 Chair of the BOARD or his/her designee, the Executive Director and BOARD counsel for
26 evaluation of his compliance with the Consent Decree and for their recommendation of
27 termination of probation, full reinstatement, or additional disciplinary action at a separate
28 hearing before the BOARD.

1 VIOLATION OF TERMS OF CONSENT DECREE

2 RESPONDENT understands that the BOARD may, upon thirty (30) day notice to
3 RESPONDENT, convene a hearing for the limited purpose of establishing that he has, in
4 fact, been in violation of the terms of this Consent Decree. If such a hearing results in a
5 finding of a violation of this Consent Decree, the BOARD may impose any penalty upon
6 RESPONDENT authorized by NRS 641D.720, and including, but not limited to, revocation
7 of his license to practice as a behavior analyst in the State of Nevada.

8 In the event that a violation of the terms of the Consent Decree is alleged,
9 RESPONDENT agrees to surrender his license to the Executive Director/Board, if the
10 Executive Director/Board so requests, and refrain from practicing as a behavior analyst
11 until entry of a final order of the BOARD or a court of competent jurisdiction, whichever
12 last occurs, regarding a potential violation. RESPONDENT agrees to waive his right to
13 appeal the substantive legal basis of the original disciplinary action, which is the basis for
14 this Consent Decree. In the event an alleged violation of the Consent Decree is taken to
15 hearing and the facts which constitute the violation are determined to be not proven, no
16 disciplinary action shall be taken by the BOARD.

17 ACCEPTANCE BY THE BOARD

18 This Consent Decree will be presented to the BOARD with a recommendation for
19 approval from the Attorney General's Office at its next meeting.

20 COMPLETE CONSENT DECREE

21 This Consent Decree embodies the entire agreement between the BOARD and
22 RESPONDENT. It may not be altered, amended, or modified without the express written
23 consent of the parties.

24 DATED this 28 day of July, 2025

25 By: Chason Robinson
26 Chason Robinson LBA, Respondent
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1 The foregoing Consent Decree between RESPONDENT and the State of Nevada
2 Board of Applied Behavior Analysis in Case No. NV01LBA25 is approved as to form and
3 content.

4 DATED this 29 day of July, 2025

5 AARON D. FORD
6 Attorney General

7 By: 

8 HENNA RASUL
9 Senior Deputy Attorney General
10 100 N. Carson Street
11 Carson City, Nevada 89701
12 (775) 684-1100
13 Counsel to the State of Nevada
14 Board of Applied Behavior Analysis

15 **ORDER**

16 By a majority vote on the 19th day of August, 2025, the State of Nevada
17 Board of Applied Behavior Analysis approved and adopted the terms and conditions set
18 forth in the attached Consent Decree with Chason Robinson, LBA.

19 **IT IS HEREBY ORDERED AND MADE EFFECTIVE.**

20 DATED this 19th day of August, 2025

21 By: 

22 Chair, Board of Applied Behavior Analysis
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