

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

In re: DARSHNA PATEL
License No. 016.133848

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}
} Docket No. 2018-65
}

**DECISION ON PETITION FOR
SUMMARY SUSPENSION ORDER**

Board Members Participating:
David Baasch, DDS, Chair
Mimi Kevan, Public Member
Randall Miller, DDS
William Koch, DDS
Jennie Kendall, RDH
Cheryl Ullman, DMD
Elizabeth Merrill, Public Member

Appearances:
Prosecuting the case: Elizabeth St. James, Esq.
Respondent: the Respondent did not participate in the hearing

Presiding Officer: George K. Belcher

Exhibits:
State Ex. 1: Printout of Respondent's On-line Application dated 2/20/18
State Ex. 2; ADA NBDE II Test Report

**Summary Suspension Order
FINDINGS OF FACT, CONCLUSIONS OF LAW,
AND ORDER**

This matter came before the Board of Dental Examiners on a Petition for a Summary Suspension. The hearing was held on July 11, 2017 at the Office of Professional Regulation Conference Room at the City Center in Montpelier, Vermont. The Respondent did not appear and was not represented. The Board has authority to summarily suspend a license pending further action, if it determines that public health, safety, or welfare imperatively requires emergency action. 3 V.S.A. § 814(c).

Findings of Fact

Based on a Review of the pleadings and the file, and on evidence presented to the Board

at the hearing, the Board finds:

1. Respondent, of Laurel Maryland, was licensed as a Dentist in the State of Vermont in early 2018 and is therefore subject to the regulatory authority of this Board. 3 V.S.A. §§ 129, 129a, 26 V.S.A. Chapter 36, the Administrative Rules of the Board of Pharmacy, and the Rules of the Office of Professional Regulation. 3 V.S.A. § 814(c) permits the Board to summarily suspend a license if it finds that public health, safety, or welfare imperatively requires emergency action, and incorporates a finding to that effect in its order.
2. The prosecutor filed a "Petition for Summary Suspension" on June 26, 2018. A copy of the Petition is attached to this Decision and Order. The Petition alleges that the Respondent committed unprofessional conduct by fraudulently obtaining her Vermont dental license, and submitting a false certificate of her having passed the American Dental Association's National Board Dental Examination, Part II. The Petition for Summary Suspension further alleges that the public health, safety or welfare imperatively requires emergency action.
3. Notice of this hearing was sent to Respondent at her last known address via certified mail dated June 26, 2018. Attorney Rob Sussman advised the Prosecutor by email on July 6, 2018 that the Respondent would not be participating in the Summary Suspension hearing, nor would she be represented at the hearing.
4. On February 20, 2018 the Respondent submitted an on-line application to obtain a Vermont Dental License. As part of that application the Respondent answered "No" to the question, "Are you currently under INVESTIGATION or PENDING CHARGES in any licensing jurisdiction?" (See State Exhibit 1). This answer was false since the Respondent has been continuously under investigation by the Maryland State Board of Dental Examiners since April of 2017 for submitting false documents to that Board and for practicing beyond the scope of her limited Maryland Dental License. The Respondent was notified of the Maryland investigation by mail, email and in person in June and July of 2017. That investigation is ongoing, has not been closed, and no closure notice has been issued to the Respondent as of July 11, 2018.
5. The Respondent altered the verification of examination by the American Dental Association's National Board Dental Examination, NBDE II, in an effort to assert that she passed the test when in fact she has never passed the test. The altered verification was used by the Respondent to procure her Vermont Dental License. The Respondent admitted to Vermont Investigator John Lewis that she had altered the certification to show that she passed the test. She did not pass the test.
6. The allegations in the Petition for Summary Suspension (copy attached) have been established to the necessary degree.
7. The evidence presented imperatively requires emergency action for the public health, safety, and welfare. Specifically, summary suspension is necessary to prevent the practice of dentistry by a person who does not meet Vermont's licensing requirements and who is unqualified and prone to fraudulence. This would create significant risks to the public.

Conclusions of Law

Our Findings of Fact and Conclusions of Law in this Summary Suspension hearing are for purposes of deciding whether *at this time* there is an imperative need to take emergency action. 3 V.S.A. § 814(c). Our Findings of Fact and Conclusions of Law herein are for purposes of this Order only.

The Prosecutor's Petition for a Summary Suspension is supported by the evidence presented. The Board concludes that the allegations in the Petition for Summary Suspension have been established to the necessary degree. For purposes of this Summary Suspension Hearing, the Findings of Fact above do support Summary Suspension of Respondent's license. It appears manifest that the Respondent fraudulently and deceptively procured her Vermont Dental license in violation of 3 VSA Sec. 129a(a)(1) and that she willingly made a false report or record in the practice of her profession in violation of 3 VS Sec. 129a(a)(7). It is clear on the record before the Board that the Respondent is unqualified to practice dentistry in Vermont. There is an imperative need to take emergency action. 3 V.S.A. § 814(c).

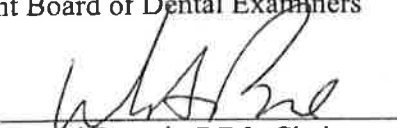
Vermont law requires that unprofessional charges be filed promptly with Respondent being afforded a prompt hearing. At any merits hearing in this matter, the prosecutor will bear the burden of proving unprofessional conduct. Our Findings and Conclusions in this matter will not absolve the prosecution or Respondent from producing or challenging relevant evidence at a merits hearing. The Findings of Fact and Conclusions of Law at a contested hearing will be based exclusively on the evidence admitted at that hearing.

Order

The Petition for Summary Suspension is **Granted**. Respondent's license is summarily suspended pending proceedings for revocation or other action. These proceedings shall be promptly instituted and determined. 3 V.S.A. § 814(c)

Vermont Board of Dental Examiners

By:


David Baasch, DDS, Chair

Date: ~~July, 2018~~ September 25, 2018

OFFICE OF PROFESSIONAL REGULATION
DATE OF ENTRY: 9-25-2018

APPEAL RIGHTS

This is a final administrative determination by the Vermont Board of Dental Examiners. A party aggrieved by a final decision of a board may appeal this decision by filing a written Notice of Appeal with the Director of the Office of Professional Regulation, Vermont Secretary

of State, 89 Main Street, Fl. 3, Montpelier, VT 056203402 within 30 days of the entry of this order. If an appeal is filed, the Director of the Office of Professional Regulation shall assign the case to an appellate officer. The review shall be conducted on the basis of the record created before the board. In cases of alleged irregularities in procedure before the board, not shown in the record, proof on that issue may be taken by the appellate officer. 3 V.S.A. §§ 129(d) and 130a.

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

IN RE:

DARSHNA PATEL

License No. 016.0133848

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Docket No. 2018- 65

PETITION FOR SUMMARY SUSPENSION

NOW COMES the State of Vermont, by and through State Prosecuting Attorney Elizabeth A. St. James, and petitions the Board of Dental Examiners to summarily suspend the license of Dentist Darshna Patel. In support of such petition, the State alleges the following:

Board Authority

1. The Vermont State Board of Dental Examiners (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by dentists, dental hygienists, and dental assistants pursuant to 3 V.S.A. §§ 129, 129a; 26 V.S.A. Chapter 12; the Administrative Rules of the Board of Dental Examiners ("ARBDE"); and the Rules of the Office of Professional Regulation.
2. The Board of Dental Examiners is authorized by 3 V.S.A. § 814 to summarily suspend the license of a dentist, dental hygienist, or dental assistant when it finds that the public health, safety, or welfare imperatively requires emergency action.

Statement of Facts

3. Darshna Patel ("Respondent") of Laurel, Maryland is licensed by the State of Vermont as a Dentist under license number 016.0133848. This license was originally issued April 12, 2018, and expires on September 30, 2019.
4. On February 20, 2018, Respondent submitted an on-line application (the "Vermont application") to obtain a Vermont Dental License (the "Vermont license").
5. As part of the Vermont application, Respondent answered "No" to the mandatory question, "Are you currently under INVESTIGATION or PENDING CHARGES in any licensing jurisdiction?"
6. This answer was false.
7. Respondent has continuously been under investigation by the Maryland State Board of Dental Examiners since April 2017 for allegedly fraudulently obtaining her limited

STATE OF VERMONT



Prosecuting Attorney
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license in Maryland by submitting fraudulent documents, as well as for practice related issues, including allegedly practicing beyond the scope of her limited license.

8. Respondent was notified of the Maryland investigation by letter and email in June and July 2017, and in person in July 2017.
9. As part of her Vermont application, Respondent submitted a certificate as proof of passing the American Dental Association's National Board Dental Examination Part II ("NBDEII").
10. Respondent has never passed the NBDEII.
11. Respondent altered the NBDEII verification that she submitted with her Vermont application in an effort to assert she passed the test and obtain her Vermont license.

Violation One: 3 V.S.A. §129a(a)(1): Fraudulent or deceptive procurement or use of a license.

12. The State re-alleges and incorporates Paragraphs 3 through 11 above.
13. Paragraphs 3 through 11 demonstrate that Respondent fraudulently and deceptively procured a license when she failed to disclose that she was under investigation by another licensing jurisdiction and when she submitted altered documents, all in an effort to obtain a Vermont dental license.
14. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(1).

Violation Two: 3 V.S.A. §129a(a)(7) Willfully making or filing false reports or records in the practice of the profession; willfully impeding or obstructing the proper making or filing of reports or records or willfully failing to file the proper reports or records.

15. The State re-alleges and incorporates Paragraphs 3 through 11 above.
16. As a Dentist, Respondent shall not willfully make or file false reports or records in the practice of the profession, willfully impede or obstruct the proper making or filing of reports or records, or willfully fail to file the proper reports or records.
17. Paragraphs 3 through 11 above demonstrate that Respondent willfully made or filed false reports or records in the practice of the profession; willfully impeded or obstructed the proper making or filing of reports or records or willfully failed to file the proper reports or records in the course of apply for licensure in the State of Vermont.

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18. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(7).

Relief Requested

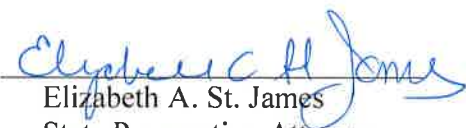
19. Respondent currently has an unencumbered license. Members of the public, patients, and potential patients have no way of learning of Respondent's dangerous behavior and will remain unprotected pending suspension of Respondent's license. The facts as set out above establish that in order to protect the public health, safety, or welfare of the people of the State of Vermont, emergency action is imperative.

WHEREFORE, the State of Vermont respectfully requests that pursuant to 3 V.S.A. § 814(c), the Respondent's dental license number 016.0133848 be summarily suspended, pending a hearing on the merits.

DATED at Montpelier, Vermont this 26th day of June, 2018.

STATE OF VERMONT
SECRETARY OF STATE

By:


Elizabeth A. St. James
State Prosecuting Attorney
(802) 828-1218
elizabeth.st.james@sec.state.vt.us

STATE OF VERMONT



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**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

IN RE:)
DARSHNA PATEL) Docket No. 2018-
License No. 016.0133848)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and makes the following Charges against the Respondent, Darshna Patel:

Board Authority

1. The Vermont State Board of Dental Examiners (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by dentists, dental hygienists, and dental assistants pursuant to 3 V.S.A. §§ 129, 129a; 26 V.S.A. Chapter 12; the Administrative Rules of the Board of Dental Examiners ("ARBDE"); and the Rules of the Office of Professional Regulation.

Statement of Facts

2. Darshna Patel ("Respondent") of Laurel, Maryland is licensed by the State of Vermont as a Dentist under license number 016.0133848. This license was originally issued April 12, 2018, and expires on September 30, 2019.
3. On February 20, 2018, Respondent submitted an on-line application (the "Vermont application") to obtain a Vermont Dental License (the "Vermont license").
4. As part of the Vermont application, Respondent answered "No" to the mandatory question, "Are you currently under INVESTIGATION or PENDING CHARGES in any licensing jurisdiction?"
5. This answer was false.
6. Respondent has continuously been under investigation by the Maryland State Board of Dental Examiners since April 2017 for allegedly fraudulently obtaining her limited license in Maryland by submitting fraudulent documents, as well as for practice related issues, including allegedly practicing beyond the scope of her limited license.
7. Respondent was notified of the Maryland investigation by letter and email in June and July 2017, and in person in July 2017.

STATE OF VERMONT



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8. As part of her Vermont application, Respondent submitted a certificate as proof of passing the American Dental Association's National Board Dental Examination Part II ("NBDEII").
9. Respondent has never passed the NBDEII.
10. Respondent altered the NBDEII verification that she submitted with her Vermont application in an effort to assert she passed the test and obtain her Vermont license.

Violation One: 3 V.S.A. §129a(a)(1): Fraudulent or deceptive procurement or use of a license.

11. The State re-alleges and incorporates Paragraphs 2 through 10 above.
12. Paragraphs 2 through 10 demonstrate that Respondent fraudulently and deceptively procured a license when she failed to disclose that she was under investigation by another licensing jurisdiction and when she submitted altered documents, all in an effort to obtain a Vermont dental license.
13. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(1).

Violation Two: 3 V.S.A. §129a(a)(7) Willfully making or filing false reports or records in the practice of the profession; willfully impeding or obstructing the proper making or filing of reports or records or willfully failing to file the proper reports or records.

14. The State re-alleges and incorporates Paragraphs 2 through 10 above.
15. As a Dentist, Respondent shall not willfully make or file false reports or records in the practice of the profession, willfully impede or obstruct the proper making or filing of reports or records, or willfully fail to file the proper reports or records.
16. Paragraphs 2 through 10 above demonstrate that Respondent willfully made or filed false reports or records in the practice of the profession; willfully impeded or obstructed the proper making or filing of reports or records or willfully failed to file the proper reports or records in the course of apply for licensure in the State of Vermont.
17. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(7).

STATE OF VERMONT



Prosecuting Attorney
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Relief Requested

WHEREFORE, the license of Darshna Patel should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Montpelier, Vermont this 6th day of November, 2018.

STATE OF VERMONT
SECRETARY OF STATE

By: Elizabeth A. St. James
Elizabeth A. St. James
State Prosecuting Attorney
(802) 828-1218
elizabeth.st.james@sec.state.vt.us

STATE OF VERMONT



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**STATE OF VERMONT
SECRETARY OF STATE
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BOARD OF DENTAL EXAMINERS**

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**Summary Suspension Order
FINDINGS OF FACT, CONCLUSIONS OF LAW,
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Findings of Fact

Based on a Review of the pleadings and the file, and on evidence presented to the Board

at the hearing, the Board finds:

1. Respondent, of Laurel Maryland, was licensed as a Dentist in the State of Vermont in early 2018 and is therefore subject to the regulatory authority of this Board. 3 V.S.A. §§ 129, 129a, 26 V.S.A. Chapter 36, the Administrative Rules of the Board of Pharmacy, and the Rules of the Office of Professional Regulation. 3 V.S.A. § 814(c) permits the Board to summarily suspend a license if it finds that public health, safety, or welfare imperatively requires emergency action, and incorporates a finding to that effect in its order.
2. The prosecutor filed a "Petition for Summary Suspension" on June 26, 2018. A copy of the Petition is attached to this Decision and Order. The Petition alleges that the Respondent committed unprofessional conduct by fraudulently obtaining her Vermont dental license, and submitting a false certificate of her having passed the American Dental Association's National Board Dental Examination, Part II. The Petition for Summary Suspension further alleges that the public health, safety or welfare imperatively requires emergency action.
3. Notice of this hearing was sent to Respondent at her last known address via certified mail dated June 26, 2018. Attorney Rob Sussman advised the Prosecutor by email on July 6, 2018 that the Respondent would not be participating in the Summary Suspension hearing, nor would she be represented at the hearing.
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6. The allegations in the Petition for Summary Suspension (copy attached) have been established to the necessary degree.
7. The evidence presented imperatively requires emergency action for the public health, safety, and welfare. Specifically, summary suspension is necessary to prevent the practice of dentistry by a person who does not meet Vermont's licensing requirements and who is unqualified and prone to fraudulence. This would create significant risks to the public.

Conclusions of Law

Our Findings of Fact and Conclusions of Law in this Summary Suspension hearing are for purposes of deciding whether *at this time* there is an imperative need to take emergency action. 3 V.S.A. § 814(c). Our Findings of Fact and Conclusions of Law herein are for purposes of this Order only.

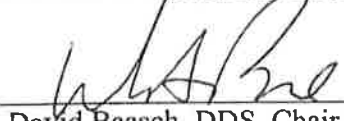
The Prosecutor's Petition for a Summary Suspension is supported by the evidence presented. The Board concludes that the allegations in the Petition for Summary Suspension have been established to the necessary degree. For purposes of this Summary Suspension Hearing, the Findings of Fact above do support Summary Suspension of Respondent's license. It appears manifest that the Respondent fraudulently and deceptively procured her Vermont Dental license in violation of 3 VSA Sec. 129a(a)(1) and that she willingly made a false report or record in the practice of her profession in violation of 3 VS Sec. 129a(a)(7). It is clear on the record before the Board that the Respondent is unqualified to practice dentistry in Vermont. There is an imperative need to take emergency action. 3 V.S.A. § 814(c).

Vermont law requires that unprofessional charges be filed promptly with Respondent being afforded a prompt hearing. At any merits hearing in this matter, the prosecutor will bear the burden of proving unprofessional conduct. Our Findings and Conclusions in this matter will not absolve the prosecution or Respondent from producing or challenging relevant evidence at a merits hearing. The Findings of Fact and Conclusions of Law at a contested hearing will be based exclusively on the evidence admitted at that hearing.

Order

The Petition for Summary Suspension is **Granted**. Respondent's license is summarily suspended pending proceedings for revocation or other action. These proceedings shall be promptly instituted and determined. 3 V.S.A. § 814(c)

Vermont Board of Dental Examiners

By: 
David Baasch, DDS, Chair

Date: ~~July, 2018~~ September 25, 2018

OFFICE OF PROFESSIONAL REGULATION
DATE OF ENTRY: 9-25-2018

APPEAL RIGHTS

This is a final administrative determination by the Vermont Board of Dental Examiners. A party aggrieved by a final decision of a board may appeal this decision by filing a written Notice of Appeal with the Director of the Office of Professional Regulation, Vermont Secretary

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**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

IN RE:

DARSHNA PATEL

License No. 016.0133848

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Docket No. 2018- 65

PETITION FOR SUMMARY SUSPENSION

NOW COMES the State of Vermont, by and through State Prosecuting Attorney Elizabeth A. St. James, and petitions the Board of Dental Examiners to summarily suspend the license of Dentist Darshna Patel. In support of such petition, the State alleges the following:

Board Authority

1. The Vermont State Board of Dental Examiners (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by dentists, dental hygienists, and dental assistants pursuant to 3 V.S.A. §§ 129, 129a; 26 V.S.A. Chapter 12; the Administrative Rules of the Board of Dental Examiners ("ARBDE"); and the Rules of the Office of Professional Regulation.
2. The Board of Dental Examiners is authorized by 3 V.S.A. § 814 to summarily suspend the license of a dentist, dental hygienist, or dental assistant when it finds that the public health, safety, or welfare imperatively requires emergency action.

Statement of Facts

3. Darshna Patel ("Respondent") of Laurel, Maryland is licensed by the State of Vermont as a Dentist under license number 016.0133848. This license was originally issued April 12, 2018, and expires on September 30, 2019.
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10. Respondent has never passed the NBDEII.
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Violation One: 3 V.S.A. §129a(a)(1): Fraudulent or deceptive procurement or use of a license.

12. The State re-alleges and incorporates Paragraphs 3 through 11 above.
13. Paragraphs 3 through 11 demonstrate that Respondent fraudulently and deceptively procured a license when she failed to disclose that she was under investigation by another licensing jurisdiction and when she submitted altered documents, all in an effort to obtain a Vermont dental license.
14. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(1).

Violation Two: 3 V.S.A. §129a(a)(7) Willfully making or filing false reports or records in the practice of the profession; willfully impeding or obstructing the proper making or filing of reports or records or willfully failing to file the proper reports or records.

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18. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(7).

Relief Requested

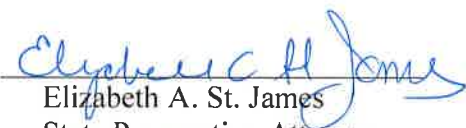
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WHEREFORE, the State of Vermont respectfully requests that pursuant to 3 V.S.A. § 814(c), the Respondent's dental license number 016.0133848 be summarily suspended, pending a hearing on the merits.

DATED at Montpelier, Vermont this 26th day of June, 2018.

STATE OF VERMONT
SECRETARY OF STATE

By:


Elizabeth A. St. James
State Prosecuting Attorney
(802) 828-1218
elizabeth.st.james@sec.state.vt.us

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**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

IN RE:

DARSHNA PATEL

License No. 016.0133848

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Statement of Facts

3. Darshna Patel ("Respondent") of Laurel, Maryland is licensed by the State of Vermont as a Dentist under license number 016.0133848. This license was originally issued April 12, 2018, and expires on September 30, 2019.
4. On February 20, 2018, Respondent submitted an on-line application (the "Vermont application") to obtain a Vermont Dental License (the "Vermont license").
5. As part of the Vermont application, Respondent answered "No" to the mandatory question, "Are you currently under INVESTIGATION or PENDING CHARGES in any licensing jurisdiction?"
6. This answer was false.
7. Respondent has continuously been under investigation by the Maryland State Board of Dental Examiners since April 2017 for allegedly fraudulently obtaining her limited

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license in Maryland by submitting fraudulent documents, as well as for practice related issues, including allegedly practicing beyond the scope of her limited license.

8. Respondent was notified of the Maryland investigation by letter and email in June and July 2017, and in person in July 2017.
9. As part of her Vermont application, Respondent submitted a certificate as proof of passing the American Dental Association's National Board Dental Examination Part II ("NBDEII").
10. Respondent has never passed the NBDEII.
11. Respondent altered the NBDEII verification that she submitted with her Vermont application in an effort to assert she passed the test and obtain her Vermont license.

Violation One: 3 V.S.A. §129a(a)(1): Fraudulent or deceptive procurement or use of a license.

12. The State re-alleges and incorporates Paragraphs 3 through 11 above.
13. Paragraphs 3 through 11 demonstrate that Respondent fraudulently and deceptively procured a license when she failed to disclose that she was under investigation by another licensing jurisdiction and when she submitted altered documents, all in an effort to obtain a Vermont dental license.
14. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(1).

Violation Two: 3 V.S.A. §129a(a)(7) Willfully making or filing false reports or records in the practice of the profession; willfully impeding or obstructing the proper making or filing of reports or records or willfully failing to file the proper reports or records.

15. The State re-alleges and incorporates Paragraphs 3 through 11 above.
16. As a Dentist, Respondent shall not willfully make or file false reports or records in the practice of the profession, willfully impede or obstruct the proper making or filing of reports or records, or willfully fail to file the proper reports or records.
17. Paragraphs 3 through 11 above demonstrate that Respondent willfully made or filed false reports or records in the practice of the profession; willfully impeded or obstructed the proper making or filing of reports or records or willfully failed to file the proper reports or records in the course of apply for licensure in the State of Vermont.

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18. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for summary suspension because Respondent has committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(7).

Relief Requested

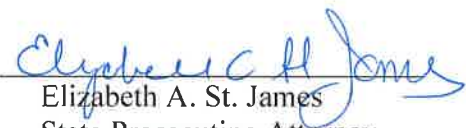
19. Respondent currently has an unencumbered license. Members of the public, patients, and potential patients have no way of learning of Respondent's dangerous behavior and will remain unprotected pending suspension of Respondent's license. The facts as set out above establish that in order to protect the public health, safety, or welfare of the people of the State of Vermont, emergency action is imperative.

WHEREFORE, the State of Vermont respectfully requests that pursuant to 3 V.S.A. § 814(c), the Respondent's dental license number 016.0133848 be summarily suspended, pending a hearing on the merits.

DATED at Montpelier, Vermont this 26th day of June, 2018.

STATE OF VERMONT
SECRETARY OF STATE

By:


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