

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

IN RE: STANLEY PINKUS, D.D.S.
Application No.:016-0074724

) Docket No. 2011-100
)

STIPULATION AND CONSENT ORDER

BOARD AUTHORITY

1. The Board of Dental Examiners ("Board") has jurisdiction to investigate and adjudicate complaints of unprofessional conduct against dentists pursuant to 3 V.S.A. §§ 129 and 129a; 26 V.S.A. §§ 767 and 809; the Administrative Rules of the Board of Dental Examiners ("RBDE") and the Rules of the Office of Professional Regulation.
2. The Board may discipline any licensee or refuse to license any person who has had a license application denied or a license revoked, suspended, limited, conditioned, or otherwise disciplined by a licensing agency in another jurisdiction for conduct which would constitute unprofessional conduct in this state, or has surrendered a license while under investigation for unprofessional conduct. 3 V.S. A. § 129(a)(5).
3. Whether or not occurring within or outside of Vermont, failing to comply with provisions of federal or state statutes or rules governing the practice of the profession is unprofessional conduct. 3 V.S.A. § 129a(a)(3).

STIPULATION

4. Stanley Pinkus, D.D.S. (the "Respondent") of Henderson, Nevada is a dental licensee applicant holding application number 016-0074724. The application was filed with the Vermont Board of Dental Examiners on or about February 1, 2011. On the application the Respondent disclosed that he had been disciplined in Nevada and provided a copy of the Nevada discipline. Attachment A. The application is pending the outcome of this proceeding.
5. On July 16, 2009 the Nevada State Board of Dental Examiners entered into a stipulated agreement with the Respondent based on several factual findings that he had violated and thus failed to comply with the Nevada statutes and rules governing the practice of Dentistry. Attachment A pages 2-4. The Respondent acknowledges that if the facts found in Attachment A had occurred in Vermont, they would constitute unprofessional conduct in Vermont.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
9 Baldwin Street
Montpelier, VT
05609-1107

6. As a result of these violations the Respondent was placed on a conditioned license and required to satisfy a number of rehabilitative conditions before being allowed to practice again with an unencumbered license. Attachment A pages 4-10.
7. On or about July 20, 2010 the Respondent was notified by the Nevada State Board of Dental Examiners that he had satisfied all of the conditions set forth in Attachment A and the status of his Nevada license had been unencumbered and restored to good standing. Attachment B.

Understandings

8. Respondent understands that the Board must review and accept the terms of the Stipulation and Consent Order. If the Board rejects any portion of the same, it shall be void in its entirety.
9. Respondent has reviewed the Stipulation and Consent Order, agrees that it sets out the entire agreement of the parties, and is freely and voluntarily entered into.
10. Respondent waives any notification period and agrees to have this document reviewed by the Board during its next meeting. Respondent specifically waives any claim that presentation of this stipulation to the Board would prejudice his right to a fair and impartial hearing should the Board reject this stipulation.
11. Respondent is not under the influence of any drugs or alcohol at the time he signs this Stipulation.
12. Respondent voluntarily waives his right to appeal the decision and order of the Board entered under this stipulation.
13. The Respondent has had the opportunity to consult with able and competent counsel in respect to this matter.
14. The Respondent acknowledges that he understands that this document and its attachments is a public record and may be used for any legal purpose. Further, that this document and its attachments will be posted on the Vermont Secretary of State's website as a disciplinary decision of the Vermont Board of Dental Examiners.
15. Respondent voluntarily waives his right to a contested hearing before the Board.

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CONSENT ORDER

Based upon the stipulations above, it is **ORDERED AND ADJUDGED** as follows:

A. Respondent's actions described above and by reference in Attachment A, demonstrate grounds for discipline as Respondent violated the laws and rules detailed in paragraphs 2-3 above.

Since it appears that the Respondent has already been rehabilitated by virtue of the Nevada order, the Vermont Board of Dental Examiners hereby **WARNS** any license that may be issued to the Respondent based on his pending application number 016-0074724.

B. The purpose of this Order is to insure that the Vermont public is aware of the Respondent's recent discipline in Nevada.

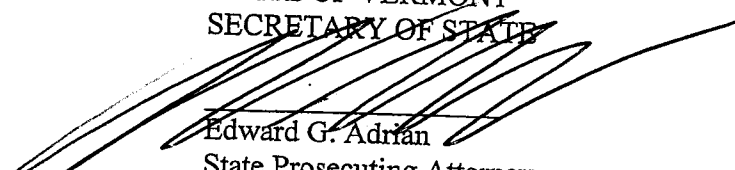
C. Notwithstanding any provision above, the Respondent must continue to meet all Board requirements for obtaining a license to practice dentistry in Vermont, as well as, maintaining a license, license renewal and license reinstatement. **This Stipulation and Consent Order does not serve as a substitute for the Respondent's application for licensure currently under review by the Board wherein the Board would determine if the Respondent meets the minimum qualifications for licensure. Rather it merely addresses a single aspect of that application which is the discipline that occurred in Nevada in 2009.**

D. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. § 129(a). This Stipulation and Consent Order will be posted on the Vermont Secretary of State's website.

E. This Stipulation and Consent Order will remain part of the Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

Date: 2/28/11

STATE OF VERMONT
SECRETARY OF STATE


Edward G. Adrian
State Prosecuting Attorney

Date: 02/18/2011

RESPONDENT
STANLEY PINKUS, D.D.S.


Stanley Pinkus, D.D.S.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
9 Baldwin Street
Montpelier, VT
05609-1107

ACCEPTED AND SO ORDERED

BOARD OF DENTAL EXAMINERS

Date: 3/9/11

By: Edward P. [Signature] DDS
Chairperson

Date entered: 3/9/11

DE008.stip.wpd

STATE OF VERMONT



Prosecuting Attorney
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9 Baldwin Street
Montpelier, VT
05609-1107

STATE OF NEVADA
BEFORE THE BOARD OF DENTAL EXAMINERS

NEVADA STATE BOARD OF DENTAL
EXAMINERS,

Case No. 08-01721

Complainant,

vs.

STANLEY PINKUS, D.D.S.,

Respondent.

STIPULATION AGREEMENT

IT IS HEREBY STIPULATED AND AGREED by and between STANLEY PINKUS, D.D.S. (hereafter "Respondent"), by and through his attorney, DAVID J. MORTENSEN, ESQ., from the firm of ALVERSON, TAYLOR, MORTENSEN & SANDERS and the NEVADA STATE BOARD OF DENTAL EXAMINERS (hereafter "Board"), by and through RICK THIRIOT, DDS, Disciplinary Screening Officer, and the Board's legal counsel, JOHN A HUNT, ESQ., of the law firm of FOX ROTHSCHILD, LLP as follows:

1. On October 25, 2007, the Board notified Respondent of a verified complaint received from Troy and Sharon Gerber. On November 27, 2007, the Board received an answer to the complaint from Respondent.

2. On August 11, 2008, the Board notified Respondent of a verified complaint received from Joseph Rytel (on behalf of minor Ryan Rytel). On September 26, 2008, the Board received an answer to the complaint from Respondent.

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Attachment A

1
2 3. On March 2, 2009, an informal hearing was held in Las Vegas, Nevada, regarding
3 alleged violations of chapter 631 of the Nevada Revised Statutes ("NRS") and chapter 631 of the
4 Nevada Administrative Code ("NAC") by licensee, STANLEY PINKUS, D.D.S. The informal
5 hearing was held pursuant to NRS § 631.363 and NAC §§ 631.250 and 631.255.

6
7 4. Based upon the limited investigation conducted to date, Disciplinary Screening Officer,
8 Rick Thiriot, DDS, applying the administrative burden of proof of substantial evidence as set
9 forth in *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and
10 see *Minton v. Board of Medical Examiners*, 110 Nev. 1060, 881 P. 2d 1339 (1994), see also NRS
11 233B.135(3)(e) & NRS 631.350(1), but not for any other purpose, including any other
12 subsequent civil action, finds there is substantial evidence Respondent violated NAC
13 631.230(1)(c) regarding treatment rendered to patient Troy Gerber based upon the following:

- 14 a. Respondent did not diagnose and chart the patient's Periodontal condition prior to
15 placing a bridge on Teeth #19, 20, and 21.
- 16 b. Respondent did not obtain a written informed consent regarding acceptance of the
17 shade of color for the bridge.
- 18 c. The Crown placed on Tooth #22 had an open margin on the distal of Tooth #22.
- 19 d. The Respondent extracted tooth #19 and left a residual root tip. Thereafter
20 Respondent placed a bridge over teeth #19, 20, 21, and 22 without first removing
21 the root tip.

22 5. Based upon the limited investigation conducted to date, Disciplinary Screening Officer,
23 Rick Thiriot, DDS, applying the administrative burden of proof of substantial evidence as set
24 forth in *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and
25 see *Minton v. Board of Medical Examiners*, 110 Nev. 1060, 881 P. 2d 1339 (1994), see also NRS
26 233B.135(3)(e) & NRS 631.350(1), but not for any other purpose, including any other


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1 subsequent civil action, finds there is substantial evidence that Respondent violated NAC
2 631.230(1)(c) regarding treatment rendered to patient Sharon Gerber based upon the following:

- 3
- 4 a. Respondent did not chart the Periodontal condition of the patient prior to placing
5 the bridge on Teeth #18, 19, 20, 21, and 22.
- 6 b. The crown placed on Tooth #22 had an open margin on the distal of tooth #22.
7 The crown placed on Tooth #22 was also too short.
- 8 c. There was an open margin on the distal of tooth #30.

9 6. Based upon the limited investigation conducted to date, Disciplinary Screening Officer,
10 Rick Thiriot, DDS, applying the administrative burden of proof of substantial evidence as set
11 forth in *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and
12 see *Minton v. Board of Medical Examiners*, 110 Nev. 1060, 881 P. 2d 1339 (1994), see also NRS
13 233B.135(3)(e) & NRS 631.350(1), but not for any other purpose, including any other
14 subsequent civil action, finds there is substantial evidence that Respondent violated NAC
15 631.230(1)(c) regarding patient Ryan Rytel (minor) when Respondent placed crowns on teeth #8
16 and #9, which should have been bonded based upon the age of the patient.

17 7. Applying the administrative burden of proof of substantial evidence as set forth in *State,*
18 *Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton v.*
19 *Board of Medical Examiners*, 110 Nev. 1060, 881 P. 2d 1339 (1994), see also NRS
20 233B.135(3)(e) & NRS 631.350(1), Respondent admits, but not for any other purpose, including
21 any subsequent civil action, that the treatment rendered to Troy Greber as set forth in paragraph
22 4 was in violation of NAC 631.230(1)(c).

23 8. Applying the administrative burden of proof of substantial evidence as set forth in *State,*
24 *Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton v.*
25 *Board of Medical Examiners*, 110 Nev. 1060, 881 P. 2d 1339 (1994), see also NRS
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1 233B.135(3)(e) & NRS 631.350(1), Respondent admits, but not for any other purpose, including
2 any subsequent civil action, that the treatment provided to Sharon Gerber as set forth in
3 paragraph 5 was in violation of NAC 631.230(1)(c).

4
5 9. Applying the administrative burden of proof of substantial evidence as set forth in *State*,
6 *Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton v.*
7 *Board of Medical Examiners*, 110 Nev. 1060, 881 P. 2d 1339 (1994), see also NRS
8 233B.135(3)(e) & NRS 631.350(1), Respondent admits, but not for any other purpose, including
9 any subsequent civil action, that the treatment provided to Ryan Rytel as set forth in paragraph 6
10 was in violation of NAC 631.230(1)(c).

11 10. Based upon the limited investigation conducted to date, the findings of the Disciplinary
12 Screening Officer, Rick Thiriot, DDS, and the admissions contained in Paragraphs 7, 8, and 9,
13 the parties have agreed to resolve the pending disciplinary action pursuant to the following terms
14 and conditions:

15 a. Respondent's shall be monitored for a period of twelve (12) months from the
16 adoption of the Stipulation Agreement to insure compliance by Respondent
17 subsequent to the execution and adoption of this Stipulation Agreement by the
18 Board. During the twelve (12) month monitoring period, Respondent shall allow
19 either the Executive Director of the Board and/or an agent appointed by the
20 Executive Director of the Board to inspect Respondent's records during normal
21 business hours without notice to inspect the billing and patient records for patients
22 who have received crown(s) and/or patient(s) who have received a three or more
23 unit bridge treatments. During the twelve (12) month monitoring period
24 Respondent shall maintain a daily log containing the following information for
any patient(s) who receives a three or more multiple unit bridge,

25 a). Name of patient

26 b). Date of treatment bridge was placed

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1 c). Explanation of treatment

2 d). Pre and Post cementations, bitewings, and radiographs.

3 The daily log for each facility where the treatment is rendered shall be made
4 available during normal business hours without notice. Failure to maintain and/or
5 provide the daily log upon request by an agent of the Board shall be an admission
6 of unprofessional conduct. Upon receipt of substantial evidence that Respondent
7 has either failed to maintain or refused to provide the daily log upon request by an
8 agent of the Board, Respondent agrees his license to practice dentistry in the State
9 of Nevada shall be automatically suspended without any further action of the
10 Board other than the issuance of an Order of Suspension by the Executive
11 Director. Thereafter, Respondent may request in writing a hearing before the
12 Board to reinstate Respondents' license. However, prior to the full Board
13 hearing, Respondent waives any right seek judicial review, including injunctive
14 relief from either the Nevada Federal District Court or the Nevada State District
15 Court to reinstate his privilege to practice dentistry in the State of Nevada pending
16 a final Board hearing. Respondent shall also be responsible for any costs or
17 attorney's fees incurred in the event the Board has to seek injunctive relief to
18 prevent Respondent from practicing dentistry during the period Respondent's
19 license is automatically suspended.

20 b. Pursuant to NRS 631.350(1)(f), Respondent, upon adoption of this Stipulation,
21 shall not provide pediatric dentistry to patients under the age of eighteen (18)
22 until Respondent has completed the nineteen (19) hours supplemental education
23 set forth in paragraph 10(c)(4) of this Stipulation. It should be noted that prior to
24 the Board's adoption of this Stipulation, the Executive Director of the Board
25 authorized a course in pediatric dentistry sponsored by the American Academy of
26 Pediatric Dentistry in partial satisfaction of the continuing education requirement
27 contained in paragraph 10(c) of this Stipulation. Respondent completed the

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1 Board-approved course in pediatric dentistry, receiving 19.75 hours of continuing
2 education credit in pediatric dentistry. Respondent submitted to the Executive
3 Director of the Board a Continuing Education Certification of Attendance as
4 proof of completion of 19.75 hours of continuing education in pediatric dentistry
5 prior to Board adoption of this Stipulation.

6
7 c. Pursuant to NRS 631.350(k), in addition to completing the required continuing
8 education, Respondent shall obtain a total of Fifty-four (54) hours of additional
9 supplemental education in the following areas:

- 10 1. Seven (7) hours shall be regarding proper billing and record
11 keeping.
- 12 2. Seven (7) hours shall be regarding radiographic interpretation and
13 diagnosing.
- 14 3. Twenty-one (21) hours shall be regarding the proper diagnosis and
15 treatment of Periodontal conditions prior performing any other
16 dental treatments, including but not limited to the placement of
17 crowns and bridges.
- 18 4. Nineteen (19) additional hours shall be in the area of appropriate
19 diagnosis for Pediatric patients.

20 Record keeping, radiography, and diagnosis and treatment of Periodontal
21 education set forth in this paragraph must be completed within twelve (12)
22 months of the adoption of this Stipulation Agreement while the nineteen (19)
23 hours in the area of Pediatric Dentistry set forth in this paragraph must be
24 completed within six (6) months of the adoption of this Stipulation Agreement.
25 Respondent can not treat children under the age of eighteen (18) until above-
26 referenced education in the area of Pediatric Dentistry is completed. As noted in
27 Paragraph 10 (b), prior to adoption of this Stipulation, Respondent began taking

1 approved courses to satisfy the requirements of Paragraphs 10(b) & 10(c)(4).
2 Respondent acknowledges and agrees he is taking such courses knowing in the
3 event the Board does not approve this Stipulation the courses taken may only be
4 applied to the regular continuing education requirements set forth in NAC
5 631.173 thru NAC 631.178. Further Respondent acknowledges and agrees the
6 taking such courses prior to adoption of this Stipulation in no way obligates the
7 Board to adopt this Stipulation. The Board is still permitted to adopt or reject
8 this Stipulation regardless of whether Respondent has taken pre-approved courses
9 prior to the adoption of this Stipulation in order to comply with the requirements
10 set for in Paragraphs 10(b) & 10(c)(4).

11 The supplemental education must be submitted in writing to the Executive
12 Director of the Board for approval prior to attendance. Upon the receipt of the
13 written request to attend the supplemental education the Executive Director of the
14 Board shall notify Respondent in writing whether the requested supplemental
15 education is approved for attendance. Respondent agrees seventy (70%) percent
16 of the supplemental education shall be completed through attendance at live
17 lecture and/or hand on clinical demonstration, which include in-office
18 education/training in record keeping and billing practices. The remaining thirty
19 (30%) percent of the supplemental education may be completed through
20 online/home study courses. The cost associated with this supplemental education
21 shall be paid by Respondent.

22 In the event Respondent fails to complete the supplemental education for
23 Pediatric Dentistry within six (6) months of adoption of this Stipulation by the
24 Board, Respondent agrees his license to practice dentistry in the State of Nevada
25 shall be automatically suspended without any further action of the Board other
26

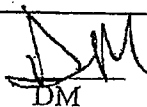
1 than the issuance of an Order of Suspension by the Executive Director. Upon
2 Respondent submitting written proof of the completion of the supplemental
3 education, Respondent's license to practice dentistry in the State of Nevada will
4 be automatically reinstated, assuming all other provisions of the Stipulation
5 Agreement are in compliance.

6
7 In the event Respondent fails to complete the supplemental education set forth in
8 paragraphs 10(c)(1), or 10(c)(2), and/or 10(c)(3) within twelve (12) months of
9 adoption of this Stipulation by the Board, Respondent agrees his license to
10 practice dentistry in the State of Nevada shall be automatically suspended without
11 any further action of the Board other than the issuance of an Order of Suspension
12 by the Executive Director. Upon Respondent submitting written proof of the
13 completion of the supplemental education, Respondent's license to practice
14 dentistry in the State of Nevada will be automatically reinstated, assuming all
15 other provisions of the Stipulation Agreement are in compliance.

16 Respondent agrees to waive any right to seek injunctive relief from any Federal or
17 State of Nevada District Court to prevent the automatic suspension of
18 Respondent's license to practice dentistry in the State of Nevada due to
19 Respondent's failure to comply with Paragraph 10(c).

20 Respondent shall also be responsible for any costs or attorney's fees incurred in
21 the event the Board has to seek injunctive relief to prevent Respondent from
22 practicing dentistry during the period Respondent's license is automatically
23 suspended.

- 24
25 d. Respondent agrees to reimburse the "Board" for the cost of the investigation and
26 the monitoring of this Stipulation Agreement in the amount of Eight Thousand



1 (\$8,000.) Dollars within thirty (30) days of the adoption of this Stipulation
2 Agreement.

3
4 e. Pursuant to NRS 631.350(1), Respondent agrees to reimburse Troy Gerber in the
5 amount of Two Thousand Nine Hundred and Seventy Nine (\$2,979.00) Dollars
6 within thirty (30) days of adoption of this Stipulation by the Board. Within thirty
7 (30) days of the adoption of this Stipulation by the Board, Respondent shall
8 deliver to the Board, a check made payable to Troy Gerber.

9
10 f. Pursuant to NRS 631.350(1), Respondent agrees to reimburse Sharon Gerber in
11 the amount of Three Thousand Five Hundred and Fifty Three (\$3,553.00) Dollars
12 within thirty (30) days of adoption of this Stipulation by the Board. Within thirty
13 (30) days of the adoption of this Stipulation by the Board, Respondent shall
14 deliver to the Board, a check made payable to Sharon Gerber.

15 g. Pursuant to NRS 631.350(1), Respondent agrees to reimburse Joseph Rytel (for
16 minor Ryan Rytel) in the amount of One Thousand Four Hundred and Twenty
17 Two (\$1,422.00) Dollars within thirty (30) days of adoption of this Stipulation by
18 the Board. Within thirty (30) days of the adoption of this Stipulation by the
19 Board, Respondent shall deliver to the Board, a check made payable to Joseph
20 Rytel (for Ryan Rytel).

21 h. In the event Respondent defaults on the payment set forth in Paragraph 10(d) or,
22 10(e) or, 10(f) or, and/or 10(g), Respondent agrees his license to practice dentistry
23 in the State of Nevada shall automatically be suspended without any further action
24 of the Board other than issuance of an Order of Suspension by the Executive
25 Director. Respondent agrees to pay a liquidated damage amount of Twenty Five
26 Dollars (\$25.00) for each day Respondent is in default on the payment(s) of any


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1 of the amounts set forth in either paragraphs 10(d) or, 10(e) or, 10(f) and/or 10(g).
2 Upon curing the default of the applicable defaulted paragraph, Respondent's
3 license to practice dentistry in the State of Nevada will automatically be reinstated
4 by the Executor Director of the Board, assuming there are no other violations of
5 any of the provisions contained in this Stipulation. Respondent shall also be
6 responsible for any costs or attorney's fees incurred in the event the Board has to
7 seek injunctive relief to prevent Respondent from practicing dentistry during the
8 period in which her license is suspended. Respondent agrees to waive any right to
9 seek injunctive relief from either the Nevada Federal District Court or the Nevada
10 State District Court to reinstate his license prior to curing any default on the
11 amounts due and owing.

12 j. In the event Respondent fails to cure any defaults in payment within forty-five
13 (45) days of the default, Respondent agrees the amount may be reduced to
14 judgment.

15 k. Respondent waives any right to have the amount owed pursuant to Paragraphs
16 10(d) or, 10(e) or, 10(f), and/or 10(g) discharged in bankruptcy.

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18 CONSENT
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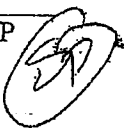
20 11. Respondent has read all of the provisions contained in this Stipulation Agreement and
21 agrees with them in their entirety.

22
23 12. Respondent is aware by entering into this Stipulation Agreement he is waiving certain
24 valuable due process rights contained in, but not limited to, NRS 631, NAC 631, NRS 233B and
25 NAC 233B.

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2 13. Respondent expressly waives any right to challenge the Board for bias in deciding
3 whether or not to adopt this Stipulation Agreement in the event this matter was to proceed to a
4 full Board hearing.

5
6 14. Respondent and the Board agree any statements and/or documentation made or
7 considered by the Board during any properly noticed open meeting to determine whether to
8 adopt or reject this Stipulation Agreement are privileged settlement negotiations and therefore
9 such statements or documentation may not be used in any subsequent Board hearing or judicial
10 review, whether or not judicial review is sought in either the State or Federal District Court.

11 15. Respondent has reviewed the Stipulation with his attorney, David Mortensen, Esquire,
12 who has explained each and every provision contained in this Stipulation to the Respondent.

13
14 16. Respondent acknowledges he is consenting to this Stipulation Agreement voluntarily,
15 without coercion or duress and in the exercise of his own free will.

16
17 17. Respondent acknowledges no other promises in reference to the provisions contained in
18 this Stipulation Agreement have been made by any agent, employee, counsel or any person
19 affiliated with the Nevada State Board of Dental Examiners.

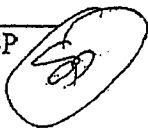
20 18. Respondent acknowledges the provisions in this Stipulation Agreement contain the entire
21 agreement between Respondent and the Board and the provisions of this Stipulation can only be
22 modified, in writing, with Board approval.

23
24 ...

25 ...

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1 19. Respondent agrees in the event the Board adopts this Stipulation Agreement he hereby
2 waives any and all rights to seek judicial review or otherwise to challenge or contest the validity
3 of the provisions contained in the Stipulation.

4
5 20. Respondent and the Board agree none of the parties shall be deemed the drafter of this
6 Stipulation Agreement. In the event this Stipulation Agreement is construed by a court of law or
7 equity, such court shall not construe this Stipulation Agreement or any provision hereof against
8 any party as the drafter of the Stipulation Agreement. The parties hereby acknowledge all parties
9 have contributed substantially and materially to the preparation of this Stipulation Agreement.

10 21. Respondent specifically acknowledges by his signature herein and by his initials at the
11 bottom of each page of this Stipulation Agreement, he has read and understands its terms and
12 acknowledges he has signed and initialed of his own free will and without undue influence,
13 coercion, duress, or intimidation.

14
15 22. Respondent acknowledges in consideration of execution of this adopted Stipulation
16 Agreement, Respondent hereby releases, remises, and forever discharges the State of Nevada, the
17 Board, and each of their members, agents, and employees in their individual and representative
18 capacities, from any and all manner of actions, causes of action, suits, debts, judgments,
19 executions, claims, and demands whatsoever, known and unknown, in law or equity, that
20 Respondent ever had, now has, may have, or claim to have against any or all of the persons or
21 entities named in this section, arising out the complaint of Mr. Troy Gerber, Ms. Sharon Gerber,
22 and Mr. Joseph Rytel (for minor Ryan Rytel).

23 23. Respondent acknowledges in the event the Board adopts this Stipulation Agreement, this
24 Stipulation may be considered in any future Board proceeding(s) or judicial review, whether
25 such judicial review is preformed by either the State or Federal District Court(s).

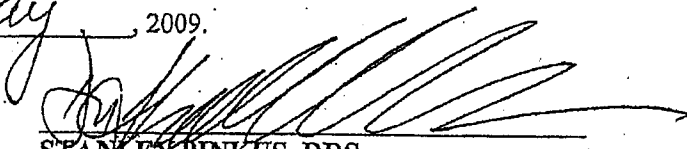
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1
2 24. This Stipulation Agreement will be considered by the Board in an open meeting. It is
3 understood and stipulated the Board is free to accept or reject the Stipulation Agreement and, if
4 the Stipulation Agreement is rejected by the Board, further disciplinary action may be
5 implemented. This Stipulation Agreement will only become effective when the Board has
6 approved the same in an open meeting. Should the Board adopt this Stipulation Agreement, such
7 adoption shall be considered a final disposition of a contested case and will become a public
8 record.

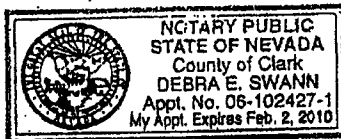
9 DATED this 20 day of May, 2009.

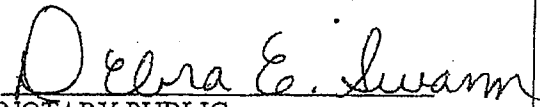
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11 
12 STANLEY PINKUS, DDS
Respondent

13 STATE OF NEVADA)
14) ss.
15 COUNTY OF CLARK)

16 On this 20th day of MAY, 2009, before me the undersigned Notary Public
17 in and for said County and State, personally appeared the Stanley Pinkus, DDS, who is known to
18 me (or satisfactorily proven) to be the person described in and who executed the foregoing
19 instrument, and who acknowledged to me that she did so freely and voluntarily and for the uses
20 and purposes therein mentioned.

21 WITNESS my hand and official seal.



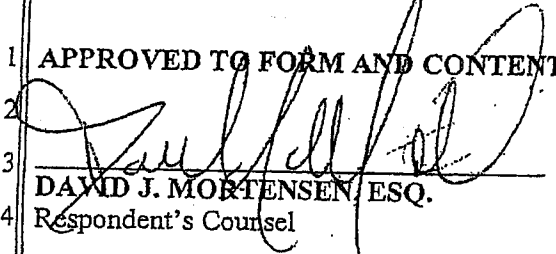
26
27 
28 NOTARY PUBLIC

Page 13 of 14

SP

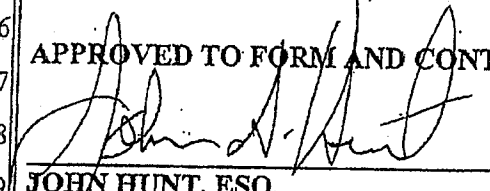
DM

1 APPROVED TO FORM AND CONTENT

2 
3
4 DAVID J. MORTENSEN, ESQ.

5 Respondent's Counsel

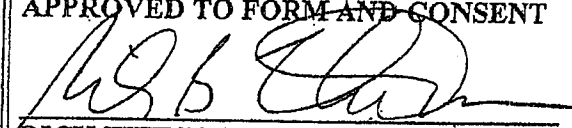
6 APPROVED TO FORM AND CONTENT

7 
8
9 JOHN HUNT, ESQ.

10 Fox Rothschild, LLP

11 Board Counsel

12 APPROVED TO FORM AND CONSENT

13 
14 RICK THRIOT, DDS

15 Disciplinary Screening Office

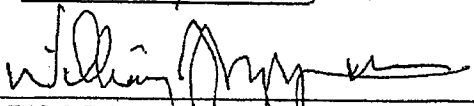
16
17 This foregoing Stipulation Agreement was:

18 Approved ☒ _____

Disapproved _____

19 by a vote of the Nevada State Board of Dental Examiners at a properly noticed meeting.

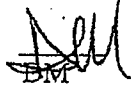
20 DATED this 16th day of JULY, 2009.

21 
22 WILLIAM G. PAPPAS, DDS, PRESIDENT
23 NEVADA STATE BOARD OF DENTAL EXAMINERS
24

25 ☐

26
27 Page 14 of 14

28 SP 


DM

7/29/10

TIM SHAFER, M.D.

775-323-3540

Nevada State Board of Dental Examiners

William G. Pappas, D.D.S.
President



Tony Guillen, D.D.S.
Secretary-Treasurer

6010 S. Rainbow Boulevard, Building A, Suite 1 • Las Vegas, Nevada 89118 • (702) 486-7044 • (800) DDS-EXAM • Fax (702) 486-7046

July 20, 2010

Stan Pinkus, DDS
8772 S Maryland Pkwy, Suite A
Las Vegas, NV 89123

Re: Stipulation Agreement

Dear Dr. Pinkus:

On July 16, 2009, you entered into a stipulation agreement with the Nevada State Board of Dental Examiners which was approved at a properly noticed meeting.

Please be advised, you have fulfilled the terms and conditions of the stipulation agreement. The dental license issued to you has been restored to good standing.

Should you or your legal counsel have any questions regarding this matter, please do not hesitate to contact me at (702) 486-7044 ext. 23.

Sincerely,


Debra Shaffer, Deputy Executive Director
Nevada State Board of Dental Examiners

Cc: John A. Hunt, Esq., Board Legal Counsel
File

nsbde@nsbde.nv.gov

11/20/09 Rev. 11/09

07/20/2010

Attachment B

Nevada State Board of Dental Examiners

William G. Pappas, D.D.S.
President



Tony Guillen, D.D.S.
Secretary-Treasurer

6010 S. Rainbow Blvd., Bldg. A, Ste. 1 • Las Vegas, NV 89118 • (702) 488-7044 • (800) DDS-EXAM • Fax (702) 488-7048

STATE OF NEVADA)
COUNTY OF CLARK) VERIFICATION OF LICENSURE

This is to certify that the records of the Nevada State Board of Dental Examiners indicate the following:

Licensee Name: Stan Pinkus, DDS
License number: 4621
License was issued on: July 29, 2004
License Status: Active
Profession: Dentist
Method of Licensure: License by Credential Required Procedure for Licensure by Credential

Current Renewal Date: June 30, 2011
Board Action/Stipulation: July 16, 2009**
Anesthesia Permits: None

*For licensees holding a specialty license who were initially licensed as a general dentist with this board, the current specialty license information is provided and the general dentistry license held reverts to expired status upon specialty licensure approval.

**A copy of the stipulation agreement may be requested by contacting the Nevada State Board of Dental Examiners.

Witness my hand and seal of the Board of Dental Examiners of the State of Nevada on October 19, 2010.

NEVADA STATE BOARD OF DENTAL EXAMINERS

A handwritten signature in cursive script, reading "Kathleen J. Kelly", is written over a horizontal line.

Kathleen J. Kelly
Executive Director

sealed

RECEIVED

OCT 21 2010

PBIS