

Nevada State Board of Dental Examiners

Tony Guillen, D.D.S.
President



Rick B. Thiriot, D.D.S.
Secretary-Treasurer

6010 S. Rainbow Blvd., Bldg. A, Ste. 1 • Las Vegas, NV 89118 • (702) 486-7044 • (800) DDS-EXAM • Fax (702) 486-7046

May 20, 2005

Legislative Counsel Bureau
Marilyn White
Assistant to the Director
401 S. Carson Street
Carson City, NV 89701-9800

Dear Director of the Legislative Counsel:

Pursuant to Nevada Revised Statute (NRS) 622.100, enclosed is our disciplinary report for the Nevada State Board of Dental Examiners. This report is for the quarter ending April 20, 2005. I have listed the disciplinary action against the following licensees below. Enclosed for your convenience are copies of the stipulation agreements.

<u>License #</u>	<u>Name</u>	<u>Disciplinary Action Date</u>
4288T	Michael Wilson, DDS	March 9, 2005
3185	Sharam Ghodsi, DDS	March 9, 2005

If you have any questions regarding this matter, please feel free to contact me at (702) 486-7044, ext. 23.

Sincerely,

A handwritten signature in cursive script that reads "Debra Shaffer".

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

Cc: John A. Hunt, Esq., Board Legal Counsel
Department of Health & Human Services
File

STATE OF NEVADA

BEFORE THE BOARD OF DENTAL EXAMINERS OF NEVADA

NEVADA STATE BOARD
OF DENTAL EXAMINERS,

Complainant,

MICHAEL WILSON, D.D.S.,

Respondent.

CASE NO.: 05-1152

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between MICHAEL WILSON, D.D.S. (Hereinafter "Respondent"), by and through his counsel, YVETTE D. ROBICHAUD, ESQ., and THE NEVADA STATE BOARD OF DENTAL EXAMINERS (hereinafter "Board") by and through Disciplinary Screening Officer, SAMUEL E. PICK, D.D.S., D.S.O., and Board's counsel, JOHN A. HUNT, ESQ., of the law firm of RALEIGH, HUNT & McGARRY, P.C. as follows:

1 On September 14, 2004, the Board notified Respondent of a verified complaint received from Marie Leggio. On September 24, 2004, Respondent filed an answer to the complaint with the Board.

2. Based upon the limited investigation conducted to date, Disciplinary Screening Officer, Samuel E. Pick, D.D.S., applying the administrative burden of proof of substantial evidence as set forth in *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton v. Board of Medical Examiners*, 110 Nev. 1060, 881 P.2d 1339 (1994), see also NRS 233B.135(3)(e), but not for any other purpose, finds there is substantial evidence that Respondent rendered treatment below the standard of care to Marie Leggio in violation of NRS 631.3475(1).

3 Based upon the limited investigation conducted to date, and the findings of Disciplinary Screening Officer, Samuel E. Pick, D.D.S., D.S.O., the parties have agreed to resolve the pending disciplinary action pursuant to the following terms.


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- a. Pursuant to NRS 631.350(d)(h), Respondent shall be placed on probation and his dental practice shall be supervised for a period of two (2) years from the adoption of this Stipulation. During the two (2) year probationary period, Respondent shall allow either the Executive Director of the Board and/or the agent appointed by the Executive Director of the Board to inspect Respondent's records during normal business hours to insure compliance of this Stipulation. During the two (2) year probationary period, Respondent's practice shall be monitored regarding those patients who receive care and treatment for multiple crowns, or multiple veneers and/or bridge restorations. Such monitoring shall include, but will not be limited to, personally observing the treatment rendered by Respondent who have received either multiple crowns, or multiple veneers and/or bridge restorations. Respondent further acknowledges the Disciplinary Screening Officer and or an agent appointed by the Executive Director may contact patient(s) who have received either multiple crowns, or multiple veneers and/or bridge restorations in the event the agent assigned believes there is substantial evidence the treatment received was below the standard of care. In the event Respondent does not actively practice dentistry in the state of Nevada, the probationary period shall be tolled for the period of inactive practice.
- b. Pursuant to NRS 631.350(k), in addition to completing the required continuing education, Respondent shall obtain a total of seventy-eight (78) additional hours in supplemental education. Twenty-four (24) hours of the supplemental educational must be receive in the area of dental occlusion. The other fifty-four (54) hours of supplemental education must be received in the area of full mouth reconstruction. All supplemental education must be completed within eighteen (18) months of the approval of this Stipulation by the Board. The supplemental education must be submitted in writing to the Executive Director of the Board for approval prior to attendance. Upon receipt of a written request to attend supplemental education the Executive Director of the Board shall notify Respondent in writing whether the requested supplemental education is approved for attendance. All costs associated with this supplemental education shall be paid by Respondent. In the event Respondent fails to complete all of the supplemental education within eighteen (18) months, Respondent agrees his license to practice dentistry in the state of Nevada shall automatically be suspended without any further action of the Board other than the issuance of an Order by the Executive Director. Upon submitting written proof of completion of the supplemental education, Respondent's license to practice dentistry in the state of Nevada will be automatically reinstated. Respondent agrees to waive any right to seek injunctive relief from any Federal or State of Nevada District Court to prevent the automatic suspension of Respondent's license to practice dentistry in the State of Nevada due to Respondent failure to comply with Paragraph 3(b). Respondent shall also be responsible for any costs or attorney's fees incurred in the event the Board has to seek injunctive relief to prevent Respondent from practicing dentistry during the period Respondent's license is automatically suspended.
- c. Respondent agrees to reimburse the Board for costs of the investigation and to monitor this Stipulation in the amount of One Thousand Two Hundred (\$1,200.00) Dollars to be paid at the time the Board adoption this Stipulation. If the Board does not adopt this Stipulation the amount of One


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Thousand Two Hundred (\$1,200.00) Dollars will be returned in full to Respondent.

- d. In the event Respondent fails to deliver to the Board the payment as required by Paragraph 3(c), Respondent agrees his license to practice dentistry in the State of Nevada shall be automatically suspended without any further action of the Board other than the issuance of an order by the Board's Executive Director suspending Respondent's license. Respondent agrees to the payment of Twenty-Five Dollars (\$25.00) for each day Respondent fails to deliver payment required by Paragraph 3(c). Respondent may cure any default regarding the payment set forth in Paragraph 3(c) by delivering to the Board's Executive Director the total amount in default, plus the Twenty-Five Dollar (\$25.00) per day assessment. Upon receipt of payment in full of any amount in default, plus the Twenty-Five Dollar (\$25.00) per day assessment, the Executive Director shall issue an Order reinstating Respondent's license to practice dentistry in the State of Nevada without any further action necessary by the Board. Respondent agrees to waive any right to seek injunctive relief from any Federal or State of Nevada District Court to prevent the automatic suspension of Respondent's license to practice dentistry in the State of Nevada due to Respondent failure to comply with Paragraph 3(c). Respondent shall also be responsible for any costs or attorney's fees incurred in the event the Board has to seek injunctive relief to prevent Respondent from practicing dentistry during the period Respondent's license is automatically suspended.
- e. In the event Respondent fails to cure any default in payment within forty-five (45) days of the default, Respondent agrees the amount may be reduced to judgment.
- f. Respondent waives any right to have the amounts owed pursuant Paragraph 3(c) discharged in bankruptcy.

CONSENT

4. Respondent has read all of the provisions contained in this Stipulation and agrees with them in their entirety.

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

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

7. Respondent has reviewed the Stipulation with his attorney, Yvette D. Robichaud, Esq., who has explained each and every provision contained in this Stipulation to the Respondent.


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1 8. Respondent acknowledges he is consenting to this Stipulation voluntarily, without
2 coercion or duress and in the exercise of his own free will.

3 9. Respondent acknowledges no other promises in reference to the provisions contained
4 in this Stipulation have been made by any agent, employee, counsel or any person affiliated with
5 the Nevada State Board of Dental Examiners.

6 10. Respondent acknowledges the provisions in this Stipulation contain the entire
7 agreement between Respondent and the Board and the provisions of this Stipulation can only be
8 modified, in writing, with Board approval

9 Respondent agrees in the event the Board adopts this Stipulation he hereby waives
10 any and all rights to seek judicial review or otherwise to challenge or contest the validity of the
11 provisions contained in the Stipulation.

12 12. This Stipulation will be considered by the Board in an open meeting. It is
13 understood and stipulated the Board is free to accept or reject the Stipulation and, if the Stipulation
14 is rejected by the Board, further disciplinary action may be implemented. This Stipulation will only
15 become effective when the Board has approved the same in an open meeting. Should the Board
16 adopt this Stipulation, such adoption shall be considered a final disposition of a contested case and
17 will become a public record and shall be reported to the National Practitioners Data Bank

18 DATED this 18 day of Feb., 2005.

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MICHAEL WILSON, D.D.S.
Respondent

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SUBSCRIBED and SWORN to before me
this 18 day of February, 2005.

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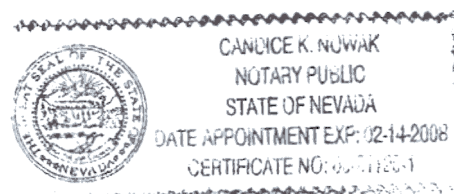
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1 APPROVED AS TO FORM & CONTENT APPROVED AS TO FORM & CONTENT

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3 John A. Hunt
4 JOHN A. HUNT, ESQUIRE
Raleigh, Hunt & McGarry, P.C.
Board Counsel5 Samuel E. Pick
6 SAMUEL E. PICK, D.D.S., D.S.O.
Disciplinary Screening Office/Informal
Hearing Officer

7 APPROVED AS TO FORM & CONTENT

8 Yvette D. Robichaud
9 YVETTE D. ROBICHAUD, ESQUIRE
Attorney for Respondent10 The foregoing Stipulation was approved/disapproved by a vote of the Nevada State Board
of Dental Examiners at a properly noticed meeting.11 DATED this 3 day of MARCH, 2005.

12 NEVADA STATE BOARD OF DENTAL EXAMINERS

13 Tony Guilen
14 TONY GUILLEN, D.D.S.
15 President16
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STATE OF NEVADA

BEFORE THE BOARD OF DENTAL EXAMINERS OF NEVADA

NEVADA STATE BOARD
OF DENTAL EXAMINERS,

Complainant,

vs.

SHAHRAM GHODSI, D.D.S.,

Respondent.

CASE NO.: 05-1153

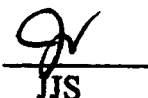
STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between SHAHRAM GHODSI, D.D.S.(Hereinafter "Respondent"), by and through his counsel, JOHN J. SILLIS, ESQ., and THE NEVADA STATE BOARD OF DENTAL EXAMINERS (hereinafter "Board") by and through Disciplinary Screening Officer, VERNON LAMBORN, D.D.S., D.S.O., and Board's counsel, JOHN A. HUNT, ESQ., of the law firm of RALEIGH, HUNT & McGARRY, P.C. as follows:

1. On September 14, 2004, the Board notified Respondent of a verified complaint received from Marie Leggio. On September 29, 2004, Respondent filed an answer to the complaint with the Board.

2. Based upon the limited investigation conducted to date, Disciplinary Screening Officer, Vernon Lamborn, D.D.S., applying the administrative burden of proof of substantial evidence as set forth in *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton v. Board of Medical Examiners*, 110 Nev. 1060, 881 P.2d 1339 (1994), see also NRS 233B.135(3)(e), but not for any other purpose, finds there is substantial evidence that Respondent rendered treatment below the standard of care to Marie Leggio in violation of NRS 631.3475(1).

3. Based upon the limited investigation conducted to date, and the findings of Disciplinary Screening Officer, Vernon Lamborn, D.D.S., the parties have agreed to resolve the


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1 pending disciplinary action pursuant to the following terms.

2 a. Pursuant to NRS 631.350(d)(h), Respondent shall be placed on probation and
3 his dental practice shall be supervised for a period of two (2) years from the
4 adoption of this Stipulation. During the two (2) year probationary period,
5 Respondent shall allow either the Executive Director of the Board and/or the
6 agent appointed by the Executive Director of the Board to inspect
7 Respondent's records during normal business hours to insure compliance of
8 this Stipulation. During the two (2) year probationary period, Respondent's
9 practice shall be monitored regarding those patients who receive care and
10 treatment for multiple crowns, or multiple veneers and/or bridge restorations.
11 Such monitoring shall include, but will not be limited to, personally
12 observing the treatment rendered by Respondent who have received either
13 multiple crowns, or multiple veneers and/or bridge restorations. Respondent
14 further acknowledges the Disciplinary Screening Officer and or an agent
15 appointed by the Executive Director may contact patient(s) who have
16 received either multiple crowns, or multiple veneers and/or bridge
17 restorations in the event the agent assigned believes there is substantial
18 evidence the treatment received was below the standard of care. During the
19 two (2) year probationary period Respondent shall maintain a list of patients
20 who either receive multiple crowns, veneers, and/or bridge restorations.
21 Further Respondent shall maintain the models for any restorations with four
22 (4) or more units. In the event Respondent does not actively practice
23 dentistry in the state of Nevada, the probationary period shall be tolled for the
24 period of inactive practice.

25 b. Pursuant to NRS 631.350(k), in addition to completing the required
26 continuing education, Respondent shall obtain a total of seventy-eight (78)
27 additional hours in supplemental education. Twenty-four (24) hours of the
28 supplemental educational must be receive in the area of dental occlusion. The
other fifty-four (54) hours of supplemental education must be received in the
area of full mouth reconstruction. All supplemental education must be
completed within eighteen (18) months of the approval of this Stipulation by
the Board. The supplemental education must be submitted in writing to the
Executive Director of the Board for approval prior to attendance. Upon
receipt of a written request to attend supplemental education the Executive
Director of the Board shall notify Respondent in writing whether the
requested supplemental education is approved for attendance. All costs
associated with this supplemental education shall be paid by Respondent. In
the event Respondent fails to complete all of the supplemental education
within eighteen (18) months, Respondent agrees his license to practice
dentistry in the state of Nevada shall automatically be suspended without any
further action of the Board other than the issuance of an Order by the
Executive Director. Upon submitting written proof of completion of the
supplemental education, Respondent's license to practice dentistry in the state
of Nevada will be automatically reinstated. Respondent agrees to waive any
right to seek injunctive relief from any Federal or State of Nevada District
Court to prevent the automatic suspension of Respondent's license to practice
dentistry in the State of Nevada due to Respondent failure to comply with
Paragraph 3(b). Respondent shall also be responsible for any costs or
attorney's fees incurred in the event the Board has to seek injunctive relief to
prevent Respondent from practicing dentistry during the period Respondent's
license is automatically suspended.

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- 2 c. Respondent agrees to reimburse the Board for costs of the investigation and
- 3 to monitor this Stipulation in the amount of One Thousand Two Hundred
- 4 (\$1,200.00) Dollars to be paid at the time the Board adoption this Stipulation.
- 5 If the Board does not adopt this Stipulation the amount of One Thousand
- 6 Two Hundred (\$1,200.00) will be returned in full to Respondent.
- 7 d. Pursuant to NRS 631.350(1), Respondent agrees to reimburse, Ms. Leggio the
- 8 amount of Twenty-Nine Thousand Five Hundred \$29,500.00 Dollars upon
- 9 the adoption of this Stipulation by the Board.
- 10 e. In the event Respondent fails to pay the Board for costs and reimburse Ms.
- 11 Leggio as required by Paragraphs 3(c) and 3(d), Respondent agrees his
- 12 license to practice dentistry in the State of Nevada shall be automatically
- 13 suspended without any further action of the Board other than the issuance of
- 14 an order by the Board's Executive Director suspending Respondent's license.
- 15 Respondent agrees to the payment of Twenty-Five Dollars (\$25.00) for each
- 16 day Respondent fails to deliver payment required by Paragraphs 3(c) and
- 17 3(d). Respondent may cure any default regarding the payments set forth in
- 18 Paragraphs 3(c) and 3(d) by delivering to the Board's Executive Director the
- 19 total amount in default, plus the Twenty-Five Dollar (\$25.00) per day
- 20 assessment Upon receipt of payment in full of any amount in default, plus
- 21 the Twenty-Five Dollar (\$25.00) per day assessment, the Executive Director
- 22 shall issue an Order reinstating Respondent's license to practice dentistry in
- 23 the State of Nevada without any further action necessary by the Board.
- 24 Respondent agrees to waive any right to seek injunctive relief from any
- 25 Federal or State of Nevada District Court to prevent the automatic suspension
- 26 of Respondent's license to practice dentistry in the State of Nevada due to
- 27 Respondent failure to comply with Paragraphs 3(c) and 3(d). Respondent
- 28 shall also be responsible for any costs or attorney's fees incurred in the event
- the Board has to seek injunctive relief to prevent Respondent from practicing
- dentistry during the period Respondent's license is automatically suspended.
- f. In the event Respondent fails to cure any default in payment within forty-five
- (45) days of the default, Respondent agrees the amount may be reduced to
- judgment.
- g. Respondent waives any right to have the amounts owed pursuant Paragraphs
- 3(c) and 3(d) discharged in bankruptcy.

CONSENT

4. Respondent has read all of the provisions contained in this Stipulation and agrees with them in their entirety.

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

6. Respondent expressly waives any right to challenge the Board for bias in deciding whether or not to adopt this Stipulation in the event this matter was to proceed to a full Board


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hearing.

7. Respondent has reviewed the Stipulation with his attorney, John J. Sillis, Esq., who has explained each and every provision contained in this Stipulation to the Respondent.

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


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

10. Respondent acknowledges the provisions in this Stipulation contain the entire agreement between Respondent and the Board and the provisions of this Stipulation can only be modified, in writing, with Board approval.

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

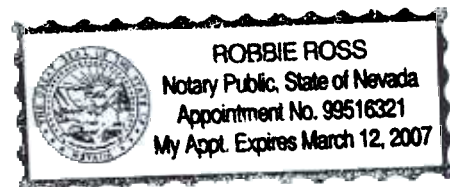
12. This Stipulation will be considered by the Board in an open meeting. It is understood and stipulated the Board is free to accept or reject the Stipulation and, if the Stipulation is rejected by the Board, further disciplinary action may be implemented. This Stipulation will only become effective when the Board has approved the same in an open meeting. Should the Board adopt this Stipulation, such adoption shall be considered a final disposition of a contested case and will become a public record and shall be reported to the National Practitioners Data Bank.

DATED this 17th day of Feb., 2005.


SHAHRAM GHODSI, D.D.S.
Respondent

SUBSCRIBED and SWORN to before me
this 18th day of February, 2005.


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APPROVED AS TO FORM & CONTENT

APPROVED AS TO FORM & CONTENT

JOHN A. HUNT, ESQUIRE
Raleigh, Hunt & McGarry, P.C.
Board Counsel

VERNON LAMBORN, D.D.S., D.S.O.
Disciplinary Screening Office/Informal
Hearing Officer

APPROVED AS TO FORM & CONTENT

JOHN J. SELUIS, ESQUIRE
Attorney for Respondent

The foregoing Stipulation was approved/disapproved by a vote of the Nevada State Board of Dental Examiners at a properly noticed meeting.

DATED this 13 day of March, 2005.

NEVADA STATE BOARD OF DENTAL EXAMINERS

TONY GUZZEN, D.D.S.
President

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