

Nevada State Board of Dental Examiners

Tony Guillen, D.D.S.
President



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

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

November 16, 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 October 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>
3468	Richard Wu, DDS	August 26, 2005
3359	Anthony LaMancusa, DMD	August 26, 2005

Dental License Suspension for 2005 Non-Renewal: 148
Dental Hygiene License Suspension 2005 for Non-Renewal: 115
Dental License Revocation due to 2005 Non-Renewal: 30
Dental Hygiene Revocation due to 2005 Non-Renewal: 60

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, reading "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,

vs.

RICHARD WU, D.D.S.,

Respondent.

CASE NO.: 05-1178

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between RICHARD WU, D.D.S. (hereinafter "Respondent"), in proper person, and THE NEVADA STATE BOARD OF DENTAL EXAMINERS (hereinafter "Board"), by and through Disciplinary Screening Officer, BYRON BLASCO, D.M.D., D.S.O., and the Board's counsel, JOHN A. HUNT, ESQ., of the law firm of RALEIGH, HUNT & MCGARRY, P.C. as follows:

1. On March 25, 2005, the Board notified Respondent of a verified complaint received from Ms. Adriana Gonzalez. On March 30, 2005, Respondent filed an answer to the complaint with the Board.

2. Based upon the limited investigation conducted to date, Disciplinary Screening Officer, Byron Blasco, D.M.D., 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 Adriana Gonzalez in violation of NRS 631.3475(1).

3. 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

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1 233B.135(3)(e), but not for any other purpose, Respondent admits the treatment rendered to Adriana
2 Gonzalez was below the standard of care in violation of NRS 631.3475(1).

3 4. Based upon the limited investigation conducted to date, the findings of Disciplinary
4 Screening Officer, Byron Blasco, D.M.D., D.S.O., and the admission contained in paragraph three
5 (3) the parties have agreed to resolve the pending disciplinary action pursuant to the following terms
6 and conditions:

- 7 a. Pursuant to NRS 631.350(1), Respondent shall reimburse, Ms. Adriana
8 Gonzalez upon adoption of this Stipulation by the Board the amount of
9 \$6,250.00. The reimbursement amount set forth in this paragraph shall be
10 delivered to the Board office within seven days after execution of this
11 Stipulation by Respondent. The payment will not be delivered to Ms.
12 Gonzalez unless this Stipulation is adopted by the Board. If this Stipulation
13 is not adopted by the Board the payment shall be returned to Respondent.
- 14 b. Respondent agrees to reimburse the Board for costs of the investigation and
15 to monitor this Stipulation in the amount of one thousand (\$1,000.00) Dollars
16 to be paid at the time the Board adoption this Stipulation. The
17 reimbursement amount set forth in this paragraph shall be delivered to the
18 Board office within seven (7) days after execution of the Stipulation by
19 Respondent. The payment will be deposited by the Board upon receipt. If
20 this Stipulation is not adopted, the Board will issue a check in the amount of
21 one thousand dollars (\$1,000.00) to Respondent.
- 22 c. In the event Respondent fails to deliver to the Board the payment as required
23 by Paragraph 4(a) or 4(b), Respondent agrees his license to practice dentistry
24 in the State of Nevada shall be automatically suspended without any further
25 action of the Board other than the issuance of an order by the Board's
26 Executive Director suspending Respondent's license. Respondent agrees to
27 the payment of Twenty-Five Dollars (\$25.00) for each day Respondent fails
28 to deliver payment required by Paragraph 4(a) or 4(b). Respondent may
cure any default regarding the payment set forth in Paragraph 4(a) or 4(b) 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's failure to
comply with Paragraph 4(a) or 4(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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1 d. Pursuant to NRS 631.350(k), in addition to completing the required
2 continuing education, Respondent shall obtain a total of eighteen (18)
3 additional hours in supplemental education in the area of record keeping and
4 treatment planing. All supplemental education must be completed within
5 twelve (12) months of the approval of this Stipulation by the Board. The
6 supplemental education must be submitted in writing to the Executive
7 Director of the Board for approval prior to attendance. Upon receipt of a
8 written request to attend supplemental education the Executive Director of
9 the Board shall notify Respondent in writing whether the requested
10 supplemental education is approved for attendance. All costs associated with
11 this supplemental education shall be paid by Respondent. In the event
12 Respondent fails to complete all of the supplemental education within twelve
13 (12) months, Respondent agrees his license to practice dentistry in the state
14 of Nevada shall automatically be suspended without any further action of the
15 Board other than the issuance of an Order by the Executive Director. Upon
16 submitting written proof of completion of the supplemental education,
17 Respondent's license to practice dentistry in the state of Nevada will be
18 automatically reinstated. Respondent agrees to waive any right to seek
19 injunctive relief from any Federal or State of Nevada District Court to
20 prevent the automatic suspension of Respondent's license to practice
21 dentistry in the State of Nevada due to Respondent's failure to comply with
22 Paragraph 4(d). Respondent shall also be responsible for any costs or
23 attorney's fees incurred in the event the Board has to seek injunctive relief to
24 prevent Respondent from practicing dentistry during the period Respondent's
25 license is automatically suspended.

15 e. In the event Respondent fails to cure any default in payment within forty-five
16 (45) days of the default, Respondent agrees the amount may be reduced to
17 judgment.

17 f. Respondent waives any right to have the amounts owed pursuant Paragraph
18 4(a) or 4(b) discharged in bankruptcy.

19 CONSENT

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

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

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

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1 8. Respondent acknowledges he has read the Stipulation. Respondent acknowledges
2 he has been advised he has the right to have this matter reviewed by independent counsel and he
3 has had ample opportunity to seek independent counsel. Respondent has been specifically informed
4 he should seek independent counsel and advice of independent counsel would be in Respondent's
5 best interest. Having been advised of his right to independent counsel, as well as had the
6 opportunity to seek independent counsel, Respondent hereby acknowledges, by his own free
7 will, he is consenting to the Stipulation without independent counsel. RW.

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

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

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

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

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

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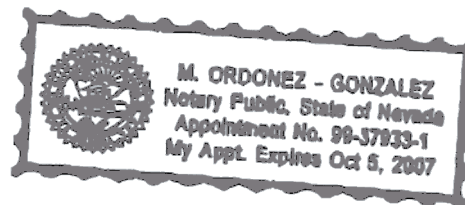
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DATED this day of AUG 09 2005.

Richard Wu
RICHARD WU, D.D.S.
Respondent

SUBSCRIBED and SWORN to before me
this day of AUG 09 2005.

M. Ordonez - Gonzalez
NOTARY PUBLIC



APPROVED AS TO FORM & CONTENT

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

APPROVED AS TO FORM & CONTENT

Byron Blasco
Byron Blasco, D.M.D., D.S.O.
Disciplinary Screening Officer/Informal
Hearing Officer

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

DATED this 26 day of June, 2005.

NEVADA STATE BOARD OF DENTAL EXAMINERS

Tony Guillen
TONY GUILLEN, D.D.S.
President

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STATE OF NEVADA

BEFORE THE BOARD OF DENTAL EXAMINERS OF NEVADA

NEVADA STATE BOARD OF
DENTAL EXAMINERS,

Case No. 05-1195

Complainant,

-vs-

ANTHONY LaMANCUSA, D.M.D.,

Respondent.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED between ANTHONY LaMANCUSA, D.M.D. (hereinafter "Respondent"), by and through his counsel, JOHN C. WAWERNA, ESQ., and the NEVADA STATE BOARD OF DENTAL EXAMINERS (hereinafter "Board") by and through its counsel, JOHN A. HUNT, ESQ. of the law firm of RALEIGH, HUNT & McGARRY, P.C., as follows:

1. On January 26, 2005, the Respondent was notified by the Board of an authorized investigation into Respondent's prescription writing practices. On June 2, 2005, Earl L. Hawley, Esq. filed an answer to the authorized investigation on behalf of Respondent.

2. Based upon the limited investigation conducted to date, Disciplinary Screening Officer, J. Stephen Sill, D.M.D., 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 Respondent on more than one occasion violated NRS 631.3475(5), when Respondent administered a controlled substance that was not required to treat a dental patient.


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1 3. Based upon the limited investigation conducted to date, Disciplinary Screening
2 Officer, J. Stephen Sill, D.M.D., applying the administrative burden of proof of substantial evidence
3 as set forth in *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986);
4 and see *Minton v. Board of Medical Examiners*, 110 Nev. 1060, 881 P.2d 1339 (1994), see also NRS
5 233B.135(3)(e), but not for any other purpose, finds there is substantial evidence Respondent on
6 more than one occasion violated NAC 631.230(1)(b), when Respondent wrote prescriptions for
7 controlled substances in such excessive amounts as to constitute a departure from prevailing
8 standards of acceptable dental practice.
9

10
1 4. Applying the administrative burden of proof of substantial evidence as set forth in
12 *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton*
13 *v. Board of Medical Examiners*, 110 Nev. 1060, 881 P.2d 1339 (1994), see also NRS
14 233B.135(3)(e), but not for any other purpose, Respondent admits on more than one occasion,
15 Respondent violated NRS 631.3475(5) when Respondent administered a controlled substance that
16 was not required to treat a dental patient.
17

18 5. Applying the administrative burden of proof of substantial evidence as set forth in
19 *State, Emp. Security v. Hilton Hotels*, 102 Nev. 606, 608, 729 P.2d 497, 498 (1986); and see *Minton*
20 *v. Board of Medical Examiners*, 110 Nev. 1060, 881 P.2d 1339 (1994), see also NRS
21 233B.135(3)(e), but not for any other purpose, Respondent admits on more than one occasion,
22 Respondent violated NAC 631.230(1)(b) when Respondent wrote prescriptions for controlled
23 substances in such excessive amounts as to constitute a departure from prevailing standards of
24 acceptable dental practice.
25

26 6 Based upon the admissions contained in Paragraphs 4 and 5, Respondent agrees to
27 the following:
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2 a. Respondent agrees pursuant to NRS 631.350(d) and (h), Respondent shall be placed
3 on probation for a period of three (3) years. The terms and conditions of the
4 probation shall be reportable to the National Practitioners Data Bank. Respondent's
5 practice shall be supervised and monitored pursuant to the following terms and
6 conditions effective upon adoption of this Stipulation by the Board:

7 i. During the three (3) year probation/supervisory period, Respondent shall
8 allow either the Executive Director of the Board and/or an agent appointed
9 by the Board's Executive Director to inspect Respondent's records to ensure
10 compliance with this Stipulation. Such inspections shall be performed,
11 without notice, during normal business hours. Respondent further agrees
12 during this period of probation and supervision, Respondent shall maintain
13 a list of any prescriptions issued to any of Respondent's patients for
14 controlled substances. During the probationary period Respondent shall not
15 issue any prescription(s) for more than 12 units of a controlled substance for
16 each office visit where treatment was rendered. All prescriptions issued by
17 Respondent during the probationary period must be in Respondent's
18 handwriting and must have an original signature of Respondent. During the
19 probationary period Respondent is prohibited from placing telephone
20 prescriptions for controlled substances. The list of prescriptions issued by
21 Respondent's shall include the following information and shall be submitted
22 to the Executive Director of the Board on the first day of each month during
23 the probation period:

- 24 (a) patient's name;
25 (b) date of issuance;
26 (c) name of dentist who issued prescription;
27 (d) units and amount of controlled substance issued; and
28 (e) reason for issuing the controlled substance.

19 ii. In the event the Board's Executive Director has substantial evidence to
20 believe Respondent has failed to comply with any of the provisions
21 contained in Paragraph 6(a)(i) the Executive Director, without any further
22 hearing or action by the Board, shall issue an order suspending Respondent's
23 license to practice dentistry in the State of Nevada. Thereafter, Respondent
24 may request a hearing before the Board but during the pendency of the
25 hearing before the Board, Respondent waives any right to seek judicial
26 review to reinstate his privilege to practice dentistry in the State of Nevada
27 pending a final Board hearing.

25 iii. In the event the Board's Executive Director has substantial evidence to
26 believe Respondent has failed to comply with any of the provisions contained
27 in Paragraph 6(a)(i) during the probationary period, Respondent agrees to
28 surrender his License No. BL4558586 with the United States Department of
Justice, D.E.A. for Class II, Class IIN, Class III, Class IIIN, Class IV, and


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Class V for a period of three (3) years commencing upon the date of the Order of Suspension issued by the Executive Director. At the conclusion of the three (3) year period, Respondent may apply to the United States Department of Justice, D.E.A. to have his License No. BL4558586 reinstated.

- iv. In the event the Board's Executive Director has substantial evidence to believe Respondent has failed to comply with any of the provisions contained in Paragraph 6(a)(i) during the probationary period, Respondent agrees to surrender his License No. BL4558586 with the Nevada State Board of Pharmacy for Class II, Class IIN, Class III, Class IIIN, Class IV, and Class V for a period of three (3) years commencing upon the date of the Order of Suspension issued by the Executive Director. At the conclusion of the three (3) year period, Respondent may apply to the Nevada State Board of Pharmacy to have his License No. BV3599 reinstated.
- v. In the event the Board's Executive Director has substantial evidence to believe Respondent has either issued or has caused to be issued prescriptions for controlled substances identified as Class II, Class IIN, Class III, Class IIIN, Class IV or Class V subsequent to surrendering his United States Department of Justice, D.E.A., License No. BL4558586 and Nevada State Board of Pharmacy, License No. BV3599 the Executive Director, without any further hearing or action by the Board, shall issue an Order revoking Respondent's license to practice dentistry in the State of Nevada. Thereafter, Respondent may request a hearing before the Board but during the pendency of the hearing before the Board, Respondent waives any right to seek judicial review to reinstate his privilege to practice dentistry in the State of Nevada pending a final Board hearing.
- vi. During the three (3) year probation/supervisory period, Respondent shall be prohibited from the administering or having nitrous oxide present his dental practice. In the event the Board's Executive Director has substantial evidence to believe Respondent has either administered or has nitrous oxide present the Executive Director, without any further hearing or action by the Board, shall issue an Order suspending Respondent's license to practice dentistry in the State of Nevada. Thereafter, Respondent may request a hearing before the Board but during the pendency of the hearing before the Board, Respondent waives any right to seek judicial review to reinstate his privilege to practice dentistry in the State of Nevada pending a final Board hearing.
- vii. During the three (3) year probationary period, Respondent agrees to submit to random sampling of urine and/or bodily fluids for controlled and/or non-prescribed substances when so ordered by the Executive Director of the Board. Respondent shall be responsible for all costs incurred for the analysis of urine and/or bodily fluids.


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1 viii. In the event any test or analysis of bodily fluids taken from Respondent,
2 pursuant to the terms of this Stipulation, is positive, indicating the presence
3 of controlled substances (not pursuant to a valid prescription), the Executive
4 Director, without any further hearing or action by the Board, shall issue an
5 Order suspending Respondent's license to practice dentistry in the State of
6 Nevada. Thereafter, Respondent may request a hearing before the Board to
7 reinstate Respondent's license to practice dentistry in Nevada. During the
8 pendency of the hearing before the Board, Respondent waives any right to
9 seek judicial review to reinstate his privilege to practice dentistry in the State
10 of Nevada pending a final Board hearing.

11 (a) In the event Respondent fails to present himself for random
12 drug testing, within twenty-four (24) hours when ordered by
13 the Executive Director, the Executive Director without any
14 further hearing or action by the Board, shall issue an Order
15 suspending Respondent's license to practice dentistry in the
16 State of Nevada. Thereafter, Respondent may request a
17 hearing before the Board to reinstate Respondent's license to
18 practice dentistry in Nevada. During the pendency of the
19 hearing before the Board, Respondent waives any right to
20 seek judicial review to reinstate his privilege to practice
21 dentistry in the State of Nevada pending a final Board
22 hearing.

23 (b) Respondent authorizes reports generated by the urinalysis
24 and/or bodily fluids testing to be furnished to the Executive
25 Director of the Board. All reports submitted to the Executive
26 Director of the Board shall remain confidential. However, in
27 the event of a violation in the form of a confirmed, positive
28 test result, all reports previously submitted to the Executive
29 Director of the Board will be available for use by the Board
30 in connection with any subsequent disciplinary action of the
31 Board.

32 ix. Pursuant to NRS 631.350(k), in addition to completing the required
33 continuing education, Respondent shall obtain twenty (20) additional hours
34 in supplemental education relating to pharmacology and pain management.
35 Ten (10) hours of the supplemental education must be completed within six
36 (6) months of the approval of this Stipulation by the Board and the additional
37 ten (10) hours of supplemental education must be completed within one (1)
38 year of the approval of this Stipulation by the Board. The supplemental
39 education must be submitted in writing to the Executive Director of the
40 Board for approval prior to attendance. Upon receipt of a written request to
41 attend supplemental education the Executive Director of the Board shall
42 notify Respondent in writing whether the requested supplemental education

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1 is approved for attendance. All costs associated with this supplemental
2 education shall be paid by Respondent. In the event Respondent fails to
3 complete all of the supplemental education within one (1) year, Respondent
4 agrees his license to practice dentistry in the State of Nevada shall
5 automatically be suspended without any further action of the Board other than
6 the issuance of an Order by the Executive Director. Upon submitting written
7 proof of completion of the supplemental education, Respondent's license to
8 practice dentistry in the state of Nevada will be automatically reinstated.
9 Respondent agrees to waive any right to seek injunctive relief from any
10 Federal or State of Nevada District Court to prevent the automatic suspension
11 of Respondent's license to practice dentistry in the State of Nevada due to
12 Respondent failure to comply with Paragraph 6(a)(ix). Respondent shall also
13 be responsible for any costs or attorney's fees incurred in the event the Board
14 has to seek injunctive relief to prevent Respondent from practicing dentistry
15 during the period Respondent's license is automatically suspended.

- 16
- 17 x. Respondent will reimburse the Board for the cost of the investigation and to
18 monitor Respondent's practice in Nevada during the three (3) year
19 probationary period in the amount of three thousand five hundred (\$3,500.00)
20 dollars within thirty (30) days of the Board's adoption of this Stipulation.
21 This amount shall not be considered a fine and therefore is not reportable to
22 the National Practitioners Data Bank.
- 23
- 24 xi. Respondent pursuant to NRS 631.350(c) agrees to pay a fine in the amount
25 of five hundred (\$500.00) dollars upon adoption of this Stipulation by the
26 Board and shall be reportable to the National Practitioners Data Bank.
- 27
- 28 xii. In the event Respondent fails to deliver to the Board the payment as required
by Paragraph 6(a)(x) or 6(a)(xi), 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 6(a)(x) or 6(a)(xi).
Respondent may cure any default regarding the payment set forth in
Paragraph 6a(x) or 6(a)(xi) 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.
- xiii. Respondent agrees to waive any right to seek injunctive relief from any
Federal or State of Nevada District Court to prevent the suspension of
Respondent's license to practice dentistry in the State of Nevada due to


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Respondent failure to comply with Paragraphs 6(a)(i) thru or 6(xii). 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.

xiv. 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.

xv. Respondent waives any right to have the amounts owed pursuant Paragraph 6(a)(x) or 6(a)(xi) discharged in bankruptcy.

CONSENT

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

8. Respondent is aware that 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.

9. Respondent expressly waives any right to challenge the Board for bias should the Board reject this Stipulation and this matter proceed to a full Board hearing.

10. Respondent has reviewed the Stipulation with his attorney, John C Wawerna, Esq., who has explained each and every provision contained in this Stipulation to the Respondent.

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

12. 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.


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13 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

14 Respondent agrees that 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.

15. 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. 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 shall become a public record reportable to the National Practitioners data bank.

DATED this 19 day of August, 2005.

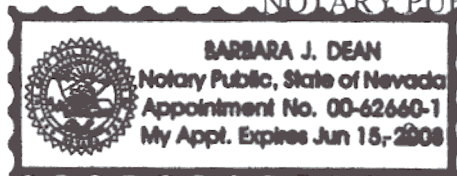
ANTHONY LaMANCUSA, D.D.S.
Respondent

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

ACKNOWLEDGMENT

On this 12 day of August, 2005, personally appeared before me, a Notary Public in and for said County and State, ANTHONY LaMANCUSA, D.M.D., known to me to be the person described in and who executed the foregoing instrument, who acknowledged to me that he executed the same freely and voluntarily

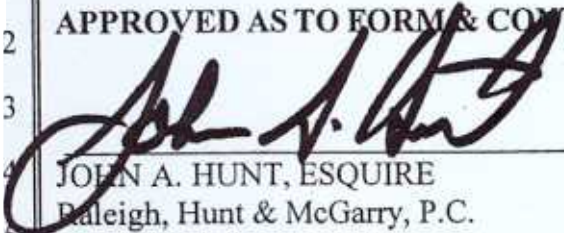
NOTARY PUBLIC in and for said County and State



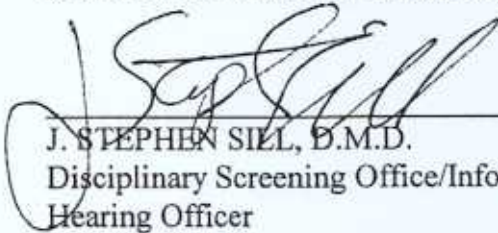

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1
2 APPROVED AS TO FORM & CONTENT

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4 
5 JOHN A. HUNT, ESQUIRE
6 Raleigh, Hunt & McGarry, P.C.
7 Board Counsel

APPROVED AS TO FORM & CONTENT

8 
9 J. STEPHEN SILL, D.M.D.
10 Disciplinary Screening Office/Informal
11 Hearing Officer

12 APPROVED AS TO FORM & CONTENT

13 
14 JOHN C. WAWERNA, ESQUIRE
15 Attorney for Respondent

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

18 DATED this 26 day of Decr., 2005.

19 NEVADA STATE BOARD OF DENTAL EXAMINERS

20 
21 TONY GUILLEN, D.D.S.,
22 President

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