



CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

## New Jersey Office of the Attorney General

Division of Consumer Affairs  
New Jersey State Board of Physical Therapy Examiners  
124 Halsey Street, 6<sup>th</sup> Floor, Newark, NJ 07102



JOHN J. HOFFMAN  
Acting Attorney General

STEVE C. LEE  
Acting Director

August 25, 2015

### By Certified and Regular Mail

Matthew Riordan, P.T.  
109 Beechwood Road  
Florham Park, NJ 07932

**Mailing Address:**  
P.O. Box 45014  
Newark, NJ 07101  
(973) 504-6455

Re: Offer of Settlement In Lieu of Filing a Formal Disciplinary Complaint

Dear Mr. Riordan:

This letter is to advise you that the New Jersey State Board of Physical Therapy Examiners (the "Board") has had an opportunity to review information concerning the reinstatement of the license application of Yuchin Chang, P.T. to practice physical therapy in the state of New Jersey that was received on or about June 1, 2015. Specifically, the information reviewed included the reinstatement application that indicated that Ms. Chang failed to renew her license to practice physical therapy on January 31, 2014 or within thirty (30) days of that date. You acknowledged in a separate correspondence also dated June 1, 2015 that you employed Ms. Chang from August 2011 as a physical therapist and that "she has maintained a record of exceptional patient care." Your letter further provided that you recently learned that Ms. Chang had failed to renew her license and that she was immediately suspended in approximately June of 2015 from treating patients until her license was renewed.

The Board has preliminarily found that probable cause exists to support a finding that you violated N.J.S.A. 45:9-37.19 and 45: 1-21(n) by aiding and abetting the unlicensed practice of physical therapy in that you permitted Mrs. Chang to continue engaging in the practice of physical therapy upon the expiration of her license on January 31, 2014 and you continued to allow her to practice with a suspended license for approximately 16 months from March 1, 2014 through June 1, 2015. As the owner of the practice you should have been reviewing the licenses of all your physical therapist on staff in your practice to assure that they had renewed their licenses and that you had posted a current license in your office for each physical therapist employed at your facility.

At this juncture, the Board has preliminarily concluded that the above violations are sufficient to warrant the initiation of formal disciplinary proceedings against you. Notwithstanding that decision, however, the Board has determined that it will first offer

you an opportunity to settle this matter, and thereby avoid the initiation of disciplinary proceedings, should you consent to:

1. Cease and desist in the future from continuing to allow an employee to practice physical therapy without a valid current license.

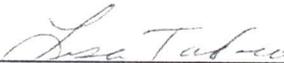
2. Pay a civil penalty in the amount of \$1000.00 for aiding and abetting the unlicensed practice of physical therapy by permitting your staff member whose license was suspended to continue practicing physical therapy with a suspended license. (to be paid immediately upon your signing of the acknowledgment at the bottom of this letter by sending a certified check or money order payable to the Board of Physical Therapy Examiners attention Lisa Tadeo, P.O. Box 45012, Newark, New Jersey 07101) .

If you are willing to settle this matter on the offered settlement terms, you may do so by signing the acknowledgment at the bottom of this letter, and returning it to the Board office. Upon your signature, this letter will be a matter of public record.

In the event you are unwilling to settle this matter on the offered terms, it will be referred to the Attorney General's office for the initiation of appropriate enforcement action. In such event, you will be afforded an opportunity to defend against the alleged violations. If an evidentiary hearing is deemed warranted the Board will either conduct that hearing at a date and time to be scheduled or refer the matter to the Office of Administrative Law. You are advised, however, that in the event formal charges are filed, the Board may assess civil penalties in an amount greater than that herein offered in settlement should any charges against you be sustained. Additionally, the Board may, if the facts are found to so warrant, enter an order, requiring you to reimburse certain monies and/or requiring you to pay costs incurred by the Board. Should you have any questions concerning this letter or the settlement offer herein, I suggest that you contact Deputy Attorney General, Carmen A. Rodriguez who may be reached at (973) 648-3696.

If you elect to settle this matter presently, you should sign the acknowledgment at the bottom of this letter and return it to the Board within fifteen (15) days following your receipt of this letter. In the event that the Board receives no response from you within fifteen (15) days, the Board's settlement offer will be withdrawn, and the matter will be referred to the Attorney General's Office for the initiation of appropriate enforcement proceedings.

NEW JERSEY STATE BOARD OF  
PHYSICAL THERAPY EXAMINERS

By:   
Lisa Tadeo  
Executive Director

ACKNOWLEDGMENT: I, Matthew Riordan, P.T., hereby acknowledge that I have read and reviewed the settlement proposal set forth in the above letter. I acknowledge the conduct which has been charged. I am aware that, by signing this acknowledgment, I am waiving any rights I may have to defend myself against any charges of wrongdoing at an administrative hearing. I am also aware that the action taken against me by the Board herein is a matter of public record, and that this letter is a public document. I hereby agree to pay a penalty in the amount of \$1000.00 (to be paid upon signing of this acknowledgment).

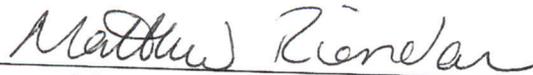
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Matthew Riordan, P.T.

Dated:

cc: Carmen A. Rodriguez, Deputy Attorney General

ACKNOWLEDGEMENT: I, Matthew Riordan, P.T., hereby acknowledge that I have read and reviewed the settlement proposal set forth in the above matter. I acknowledge the conduct which has been charged. I am aware that, by signing this acknowledgement, I am waiving any rights I may have to defend myself against any charges of wrongdoing at an administrative hearing. I am also aware that the action taken against me by the Board herein is matter of public record, and that this letter is a public document. I hereby agree to pay a penalty in the amount of \$1,000.00 (to be paid upon signing of this acknowledgement). Additionally, I am aware that upon receipt of said settlement payment by the New Jersey State Board of Physical Therapy Examiners, no charges of wrongdoing will be filed against me or my physical therapy practice, no disciplinary proceedings will be instituted against me or my physical therapy practice and this matter will be considered permanently closed with the New Jersey State Board of Physical Therapy Examiners and New Jersey Office of the Attorney General.



Matthew Riordan, P.T.

Dated: September 9, 2015