CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

New Jersey Office of the Attorney General

Division of Consumer Affairs
State Board of Dentistry
124 Halsey Street, 6th Floor, Newark, NJ 07102

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Acting Attorney General

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Acting Director

Mailing Address:
P.O. Box 45005
Newark, NJ 07101
(973) 504-6405

Via Certified and Regular Mail

November 23, 2015

Samuel Meghadri, D.D.S.
C/o Daniel G. Giaquinto, Esq.
Kern Augustine Conroy & Schoppman
1120 Route 22 East
Bridgewater, NJ 08807

RECEIVED AND FILED
WITH THE
N.J. BOARD OF DENTISTRY
ON 12-15-15 DA

RE: OFFER OF SETTLEMENT IN LIEU OF FORMAL ACTION – File #100342

Dear Dr. Meghadri:

This letter is to advise you that the New Jersey State Board of Dentistry completed its review of information concerning the above captioned file. Specifically, the information reviewed included:

1. The patient's complaint;
2. A copy of your response, including patient treatment and financial records, and other office records;
3. Other available information about the patient's condition.

Based upon the review of these matters, the Board has determined that you have engaged in the following actions which constitute violations of the Board's statutes and regulations:

1. **Treatment Planning and Record Keeping** - You treated the patient on two occasions when no completed medical history was in the chart, and there is no notation in the patient record that you reviewed the medical history with the patient.

This failure to adequately assess and document the patient's medical history prior to initiating treatment, may constitute acts of negligence sufficient to initiate the filing of formal disciplinary proceedings. However, the Board has determined that it will first offer you an opportunity to settle this matter, and avoid the initiation of formal disciplinary proceedings, should you agree to the following:

1. Agree to the assessment of a civil penalty of $500.

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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. The penalty should be paid by a check or money order made payable to the "State of New Jersey" and submitted to the Board office. You should be aware that upon receipt of your signed acknowledgment, 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 an 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 those offered in settlement here, in addition to other sanctions, 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 the additional costs incurred by the Board. Should you have any questions concerning this letter or the settlement offer, I suggest that you contact Deputy Attorney General Nancy Costello Miller, who may be reached at (973) 648-2500.

If you elect to settle this matter, 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.

Sincerely,
NEW JERSEY STATE BOARD OF DENTISTRY

Jonathan Eisenmenger
Executive Director

cc: Nancy Costello Miller, Deputy Attorney General

ACKNOWLEDGMENT AND AGREEMENT

ACKNOWLEDGMENT: I, Samuel Meghadri, D.D.S., have read and reviewed the settlement proposal set forth in this settlement 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 is a matter of public record, and that this letter is a public document. I agree to comply with the directives noted. I will:

1. Agree to the assessment of a civil penalty of $500. I have enclosed a check or money order payable to the "State of New Jersey."

12/2/15
Date

Samuel Meghadri, D.D.S.