## Stewart I. Perim, D.D.S. License Number: 7940

Arpana Singh Verma, D.D.S.
Board President
Maryland State Board of Dental Examiners
55 Wade Avenue/Tulip Drive
Catonsville, Maryland 21613

RE: PERMANENT SURRENDER OF LICENSE

License Number: 7940 Case Number: 2022-018

Dear Dr. Verma and Members of the Board:

Please be advised that I have decided to **PERMANENTLY SURRENDER** my license to practice dentistry in the State of Maryland, License Number 7940, effective immediately upon the execution of this letter by the Board President. I understand and agree that immediately upon the Board's acceptance of this letter of surrender, I may not represent myself to the public by title, description of services, methods, procedures, or otherwise that I am licensed to practice dentistry in Maryland. Moreover, I may not practice dentistry in the State of Maryland as it is defined in the Maryland Dentistry Act (the "Act"), Md. Code Ann., Health Occ. ("Health Occ.") § 4-101 (2021 Repl. Vol.).

I understand that upon the Board's acceptance, this Permanent Letter of Surrender becomes a **FINAL ORDER** of the Board. I understand that the permanent surrender of my license means that I am in the same position as an unlicensed individual.

My decision to surrender my license to practice dentistry in Maryland was prompted by the Maryland State Board of Dental Examiners' (the "Board's") investigation of my license, initiated in or around October 2021, based on criminal charges filed against me in the District Court of Maryland for Wicomico County, case number D-023-CR-21-001746, to wit, six (6) counts of insurance fraud, in violation of Md. Code Ann., Insurance § 27-403. The charges alleged that I fraudulently billed patients and their dental insurance companies for services not rendered. The Board's subsequent investigation determined that I: fraudulently or deceptively used a license; obtained a fee by fraud; behaved dishonorably or unprofessionally; and willfully filed a false report or record in the practice of dentistry.

For the purposes of this licensing action, I have decided to surrender my license in order to avoid the time, effort, and cost to defend against these allegations. Nevertheless, I understand that if the Board were to proceed with a disciplinary action and evidentiary hearing in this matter, the State would be able to substantiate the Board's investigative

Letter of Surrender Stewart I. Perim, D.D.S.

License No.: 7940, Case No.: 2022-018

Page 2 of 3

findings through the *Alford* plea of guilty I entered on June 3, 2022, for one count of insurance fraud in the District Court of Maryland for Wicomico County for which I received a 10-year suspended sentence and three years of supervised probation with terms and conditions.

I wish to state clearly that I have voluntarily, knowingly, and freely chosen to submit this Permanent Letter of Surrender. I understand that by signing this Permanent Letter of Surrender, I am waiving the right to contest any potential charges the Board may issue relating to my *Alford* plea of guilty and conviction for insurance fraud in a formal evidentiary hearing at which I would have the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf and to all other substantive and procedural protections provided by law, including the right to appeal.

I acknowledge that upon the execution of this Permanent Letter of Surrender, I shall surrender to the Board any indicia of Maryland dentistry license that is in my possession, including my Maryland dental license, number 7940, any wall certificate, renewal certificates and wallet-sized renewal cards. I understand that the Board will advise the National Practitioner Data Bank of this Permanent Letter of Surrender, and in any response to inquiry, that I have permanently surrendered my license in lieu of potential disciplinary action under the Act that the Board may institute. I also understand that in the event I should apply for licensure in any form in any other state or jurisdiction, that this Permanent Letter of Surrender, and all underlying documents, may be released or published by the Board to the same extent as a final order that would result from disciplinary action pursuant to Md. Code Ann., General Prov. §§ 4-101 et seq. (2019 Repl. Vol.).

I further recognize and agree that by submitting this Permanent Letter of Surrender, my license will remain permanently surrendered, and I may not apply for a reinstatement of my license or a new license.

I acknowledge that I may not rescind this Letter of Surrender in part or in its entirety for any reason whatsoever. I understand the nature and effect of both the Board's actions and this Permanent Letter of Surrender fully. I acknowledge that I understand the language, meaning, terms, and effect of this Letter of Surrender. I acknowledge that I had the opportunity to consult with an attorney and elected not to do so before signing this Permanent Letter of Surrender, and I make this decision knowingly and voluntarily and without any duress.

Sincerely yours,

Stewart I Perim

Date

Letter of Surrender Stewart I. Perim, D.D.S.

License No.: 7940, Case No.: 2022-018

Page 3 of 3

## **NOTARY PUBLIC**

STATE OF Maryland	
CITY/COUNTY OF	acomico
I HEREBY CERTIFY that on this	
AS WITNESS my	hand and Notarial seal.
	Notary Public  NOTAD  N
On this 3 day of	of <u>Luguel</u> , 2022, I, Arpana Singh
Verma, D.D.S., on behalf of the Maryland State Board of Dental Examiners, accept Stewart	
I. Perim's PUBLIC PERMANENT SURRENDER of his license to practice dentistry in	
the State of Maryland.	
	Arpana Singh Verma, D.D.S. Board President Maryland State Board of Dental Examiners