

SEYED HAMID TOFIGH, D.D.S.
License No. 11554

Dr. Robert Windsor, D.D.S.
President, Maryland State Board of Dental
Examiners 55 Wage Avenue/Tulip Drive
Catonsville, MD 21228

RE: **PERMANENT** Surrender of License to Practice as a Dentist
License Number 11554
Board Case Number 2022-006

Dear Dr. Windsor:

I agree to voluntarily and **permanently surrender** my license to practice as a dentist in the State of Maryland, license number 11554, as well as all corollary permits to the Maryland State Board of Dental Examiners (the "Board"). I understand that I may not practice as a dentist, with or without compensation, as it is defined in the Maryland Dentistry Act (the "Act"), Md. Code Ann., Health Occ. ("H.O.") § 4-101 *et seq.* and the Board's regulations, COMAR 10.44.01 *et seq.* In other words, as of the effective date of this Permanent Letter of Surrender, I understand that I am in the same position as an individual who is not licensed to practice as a dentist. I understand that on acceptance by the Board, this Permanent Letter of Surrender shall become a final disciplinary order of the Board and, as such, a **PUBLIC** document. I agree that this letter may be released or published by the Board as a final decision and order under H.O. 1- 607 as well as the Public Information Act, Md. Code Ann., General Provisions §§ 4-101 *et seq.*

^{6th} The decision to permanently surrender my license stems from the fact that on February 6th, 2024, in the Circuit Court for Prince George's County, Case No. C-16-CR-23-002563, I pled guilty to one count of Defrauding a State Health Plan and one count of Practicing Dentistry Without a License. Specifically, I admit that I made false representations of material fact by submitting or causing to be submitted claims for reimbursement to health care benefit programs, such as Medicaid, under the names and Medicaid provider numbers of other providers knowing that those providers did not perform the services represented and practiced dentistry on human being in the State of Maryland while unlicensed by the Board as a dentist. I understand that as a result of my guilty plea, the Board could charge my license with a violation of H.O. § 4-315(a)(4) ("Is convicted of or pleads guilty or nolo contendere to a felony or to a crime involving moral turpitude, whether or not any appeal or other proceeding is pending to have the conviction or plea set aside"). I also understand that, after the Board completes an independent investigation of the underlying facts, it is likely that the Board could additionally charge me with several other violations of the Act, including but not limited to H.O. § 4-315(a)(16) ("Behaves dishonorably or unprofessionally, or violates a professional code of ethics pertaining to the dentistry profession"). I understand that on conviction, if this matter were charged by the Board and proceeded to an evidentiary hearing before the Board, there likely is sufficient evidence to find and conclude as a matter of law that I violated H.O. §§ 4-315(a)(4) and (16) and I understand

that the Board could sanction my license as authorized by H.O. § 4-315, including the revocation of my license. Thus, in order to avoid the time, effort, and cost to defend any allegations against my license, it is my desire to permanently surrender my license to practice as a dentist at this time.

In executing this agreement to permanently surrender my license to practice as a dentist to the Board, I agree that I will not apply for reinstatement at any time. I understand that, if I were to submit a petition for reinstatement or an application for any license to the Board, the Board would not accept it. I wish to make it clear that I have voluntarily, knowingly, and freely chosen to submit this Permanent Letter of Surrender. I understand that, by executing this Permanent Letter of Surrender, I am waiving the right, now and in the future to any evidentiary hearing at which I would have the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, to contest the facts summarized in the second paragraph of this Permanent Letter of Surrender and at which I would have the right to all other substantive and procedural protections provided by law, including the right to appeal.

I acknowledge that on the execution of this Permanent Letter of Surrender, I shall surrender to the Board any indicia of my Maryland dentistry license, license number 11554, and any corollary permits, such as anesthesia/sedation permits to the Board. This includes any wall certificates, 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 response to any inquiry, that I have permanently surrendered my license in lieu of participating in any disciplinary proceeding before the Board. 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.

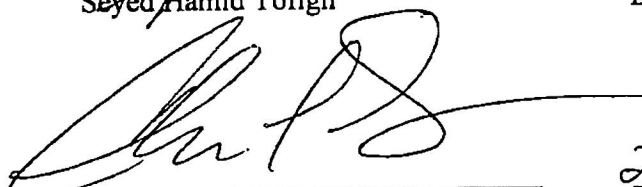
I acknowledge that I may not rescind this Permanent Letter of Surrender in part or in its entirety for any reason whatsoever. I understand the nature and effect of both the Board's actions and this Permanent Letter of Surrender fully. Finally, I wish to make clear that I have had an opportunity to discuss this matter with legal counsel and I willingly, knowingly, and voluntarily sign this letter of surrender.

Sincerely,



Seyed Hamid Tofigh

2-5-24
Date



Counsel for Seyed Hamid Tofigh

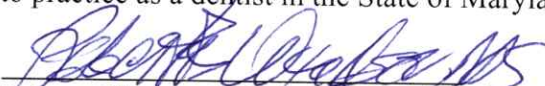
2-6-24
Date

LETTER OF SURRENDER
Seyed Hamid Tofigh, License No. 11554

ACCEPTANCE

ON BEHALF OF THE MARYLAND STATE BOARD OF DENTAL EXAMINERS, on
this 6th day of March, 20224, I accept **Seyed Hamid Tofigh's** public
permanent Letter of Surrender of his license to practice as a dentist in the State of Maryland.

3/6/24
Date


Robert Windsor, D.D.S., President
Maryland State Board of Dental Examiners