BEFORE THE
DENTAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: Case No. DBC 2017-92

Rajas Ajit Chitre, DDS

Dental License No. 46040

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender and Disciplinary Order is hereby adopted by the Dental Board of California, Department of Consumer Affairs, as its Decision in the above-entitled matter.

This Decision shall become effective on April 25, 2019.

IT IS SO ORDERED March 26, 2019.

Karen Fischer, MPA
Executive Officer
Dental Board of California
Department of Consumer Affairs
BEFORE THE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: Case No. DBC 2017-92

RAJAS AJIT CHITRE OAH No. 2018081188
984 Cameron Dr.
Folsom, CA 95630

Dental License No. 46040

Respondent.

In the interest of a prompt and speedy settlement of this matter, consistent with the public interest and the responsibility of the Dental Board of California of the Department of Consumer Affairs, the parties hereby agree to the following Stipulated Surrender and Disciplinary Order which will be submitted to the Board for approval and adoption as the final disposition of the Accusation.

PARTIES

1. Karen M. Fischer (Complainant) is the Executive Officer of the Dental Board of California (Board). She brought this action solely in her official capacity and is represented in this matter by Xavier Becerra, Attorney General of the State of California, by Mabel Lew, Deputy Attorney General.
2. Rajas Ajit Chitre (Respondent) is represented in this proceeding by attorney, Brian A. Rosenthal, whose address is:

1755 Creekside Oaks Drive, Suite 240
Sacramento, CA 95833.

3. On or about May 12, 1999, the Board issued Dental License No. 46040 to Respondent. The Dental License was in full force and effect at all times relevant to the charges brought in Accusation No. DBC 2017-92 and will expire on August 31, 2019, unless renewed.

JURISDICTION

4. Accusation No. DBC 2017-92 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on June 20, 2018. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. DBC 2017-92 is attached as Exhibit A and incorporated by reference.

ADVICEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. DBC 2017-92. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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CULPABILITY

8. In the event that Respondent should appear before the Board in any future or further proceeding, all of the charges, allegations, and facts set forth in Accusation No. DBC 2017-92 shall be deemed proven, true, and correct without the necessity of further proof.

9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Dental License without further process.

RESERVATION

10. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Dental Board of California or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

11. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

13. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
executed by an authorized representative of each of the parties.

14. In consideration of the foregoing stipulations, the parties agree that the Board may,
without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Dental License No. 46040, issued to Respondent Rajas
Ajit Chitre, is surrendered and accepted by the Board.

1. The surrender of Respondent's Dental License and the acceptance of the surrendered
license by the Board shall constitute the imposition of discipline against Respondent. This
stipulation constitutes a record of the discipline and shall become a part of Respondent's license
history with the Board.

2. Respondent shall lose all rights and privileges as a Dentist in California as of the
effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
issued, her wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in
the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
comply with all the laws, regulations and procedures for reinstatement of a revoked or
surrendered license in effect at the time the petition is filed, and all of the charges and allegations
contained in Accusation No. DBC 2017-92 shall be deemed to be true, correct and admitted by
Respondent when the Board determines whether to grant or deny the petition. Respondent shall
pay the agency its costs of investigation and enforcement in the amount of Twenty Six Thousand
One Hundred Ninety Two Dollars and Twenty Cents ($26,192.20) prior to the issuance of a new
or reinstated license. Nothing in this provision shall be construed to prohibit the Board from
reducing the amount of cost recovery upon reinstatement of the license.

5. If Respondent should ever apply or reapply for a new license or certification, or
petition for reinstatement of a license, by any other health care licensing agency in the State of
California, all of the charges and allegations contained in Accusation, No. DBC 2017-92 shall be
deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
Issues or any other proceeding seeking to deny or restrict licensure.

6. Respondent shall not apply for licensure or petition for reinstatement for three (3) 
years from the effective date of the Board's Decision and Order.

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully
discussed it with my attorney, Brian A. Rosenthal. I understand the stipulation and the effect it
will have on my Dental License. I enter into this Stipulated Surrender of License and Order
voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
Dental Board of California.

DATED: 3/20/2019

RAJAS AJIT CHITRE
Respondent

I have read and fully discussed with Respondent Rajas Ajit Chitre the terms and conditions
and other matters contained in this Stipulated Surrender of License and Order. I approve its form
and content.

DATED: March 20, 2019

BRIAN ROSENTHAL
Attorney for Respondent
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Dental Board of California of the Department of Consumer Affairs.

Dated: 3/20/19

Respectfully submitted,

XAVIER BECERRA
Attorney General of California

KENT D. HARRIS
Supervising Deputy Attorney General

MABEL LEW
Deputy Attorney General

Attorneys for Complainant

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