

**SETTLEMENT AGREEMENT BETWEEN MISSOURI DENTAL BOARD  
AND SANDRA R. STEGE, R.D.H.**

Come now Sandra R. Stege, R.D.H. ("Licensee") and the Missouri Dental Board ("Board") and enter into this settlement agreement for the purpose of resolving the question of whether Licensee's license as a dental hygienist will be subject to discipline.

Pursuant to the terms of § 536.060, RSMo,<sup>1</sup> the parties hereto waive the right to a hearing by the Administrative Hearing Commission of the State of Missouri ("AHC") regarding cause to discipline Licensee's license, and, additionally, the right to a disciplinary hearing before the Board under § 621.110, RSMo.

Licensee acknowledges that she understands the various rights and privileges afforded her by law, including the right to a hearing of the charges against her; the right to appear and be represented by legal counsel; the right to have all charges against her proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against her; the right to present evidence on her own behalf at the hearing; the right to a decision upon the record by a fair and impartial administrative hearing commissioner concerning the charges pending against her and, subsequently, the right to a disciplinary hearing before the Board at which time she may present evidence in mitigation of discipline; and the right to recover attorney's fees incurred in defending this action against her license. Being aware of these rights provided her by operation of law, Licensee knowingly and voluntarily waives each and every one of these rights and freely enters into this settlement agreement and agrees to abide by the terms of this document, as they pertain to her.

Licensee acknowledges that she has received a copy of the investigative report and other documents relied upon by the Board in determining there was cause to discipline her license, along with citations to law and/or regulations the Board believes were violated.

---

<sup>1</sup> All statutory references are to Missouri Revised Statutes, as amended, unless otherwise indicated.

For the purpose of settling this dispute, Licensee stipulates that the factual allegations contained in this settlement agreement are true and stipulates with the Board that Licensee's license, numbered 003108 is subject to disciplinary action by the Board in accordance with the provisions of Chapters 621 and 332, RSMo.

Joint Stipulation of Fact and Conclusions of Law

1. The Missouri Dental Board ("Board") is an agency of the State of Missouri created and established pursuant to § 332.021, RSMo, for the purpose of executing and enforcing the provisions of Chapter 332.

2. Sandra R. Stege, R.D.H is licensed by the Board as a dental hygienist, License No. 003108. Licensee's Missouri license was not at all times relevant herein, current and active. Licensee's license expired November 30, 2014 due to non-renewal.

3. On or about November 3, 2014, the Board received information from the Missouri Dental Well-Being Program (Well-Being) regarding Licensee. Well-Being stated that Licensee was arrested in May 2014 for fraudulently obtaining controlled substances and had completed treatment following her arrest. However, Well-Being reported that since returning from treatment, Licensee was not following the recommendations of the treatment facility and had indicated she was quitting the Well-Being program.

4. As a result of the information from Well-Being, the Board conducted an investigation. Division of Professional Registration, Central Investigative Unit Investigator James McMullin spoke with Licensee on January 23, 2014. Licensee stated she was not going to renew her license and that it was cost-prohibitive to stay in the Well-Being program. She stated she attended treatment from November 10, 2013 to January 4, 2014 for her addiction to the controlled substance Hydrocodone. She stated she was on probation and attended AA meetings for her drug addiction.

5. On or about September 2, 2014, Licensee pled guilty to the class C felony of Forgery and the class D felony of Fraudulently Attempting to Obtain Controlled Substance in the Circuit Court of Franklin County, Missouri, case number 14AB-CR00116-01. The Court suspended the imposition of sentenced and placed Licensee on five years' supervised probation.

6. Hydrocodone is a controlled substance pursuant to Chapter 195, RSMo.

7. Licensee's actions as described above in paragraphs 3 through 6 constitute cause to discipline Licensee's Missouri dental hygienist license.

8. Cause exists for the Board to take disciplinary action against Licensee's license under §332.321.2(1) and (2), RSMo, which state in pertinent part:

2. The board may cause a complaint to be filed with the administrative hearing commission as provided by chapter 621, RSMo, against any holder of any permit or license required by this chapter or any person who has failed to renew or has surrendered his or her permit or license for any one or any combination of the following causes:

(1) Use of any controlled substance, as defined in chapter 195, or alcoholic beverage to an extent that such use impairs a person's ability to perform the work of any profession licensed or regulated by this chapter;

(2) The person has been finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution pursuant to the laws of any state or of the United States, for any offense reasonably related to the qualifications, functions or duties of any profession licensed or regulated pursuant to this chapter, for any offense an essential element of which is fraud, dishonesty or an act of violence, or any offense involving moral turpitude, whether or not sentence is imposed[.]

#### Joint Agreed Disciplinary Order

9. Based upon the foregoing, the parties mutually agree and stipulate that the following shall constitute the disciplinary order entered by the Board in this matter under the authority of §§ 621.045.1 and 621.045.4, RSMo.

10. The terms of discipline shall include that Licensee's dental hygienist license, license number 003108, is hereby **VOLUNTARILY SURRENDERED** in lieu of discipline. Licensee shall immediately return all indicia of licensure to the Board office. By execution of this Settlement Agreement, Licensee surrenders and loses any and all rights under the law to practice dental hygiene in the state of Missouri and will not be able to regain licensure in the state of Missouri until she has reapplied for licensure as an original candidate and is granted licensure by the Board. If Licensee applies for licensure as a dental hygienist in the state of Missouri following the execution of this Settlement Agreement, all facts and information, if any, gathered by the Board prior to execution of this Settlement Agreement concerning any possible or alleged violations of Chapter 332, RSMo, may be considered in the Board's decision regarding whether to grant Licensee a new license.

11. The parties to this Agreement understand that the Missouri Dental Board will maintain this Agreement as an open record of the Board as provided in Chapters 332, 610 and 324, RSMo.

12. The terms of this settlement agreement are contractual, legally enforceable, and binding, not merely recital. Except as otherwise provided herein, neither this settlement agreement nor any of its provisions may be changed, waived, discharged, or terminated, except by an instrument in writing signed by the party against whom the enforcement of the change, waiver, discharge, or termination is sought.

13. Licensee, together with her heirs and assigns, and her attorneys, do hereby waive, release, acquit and forever discharge the Board, its respective members and any of its employees, agents, or attorneys, including any former Board members, employees, agents, and attorneys, of, or from, any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, any claims for attorney's fees and expenses, including any claims pursuant to § 536.087, RSMo, or any claim arising under 42 U.S.C. § 1983,

which may be based upon, arise out of, or relate to any of the matters raised in this case, its settlement, or from the negotiation or execution of this settlement agreement. The parties acknowledge that this paragraph is severable from the remaining portions of this settlement agreement in that it survives in perpetuity even in the event that any court of law deems this settlement agreement or any portion thereof to be void or unenforceable.

14. If no contested case has been filed, Licensee understands that she has the right, either at the time the settlement agreement is signed by all parties, or within fifteen days thereafter, to submit the agreement to the Administrative Hearing Commission for determination that the facts agreed to by the parties constitute grounds for disciplining Licensee's license. If Licensee desires the Administrative Hearing Commission to review this Agreement, Licensee may submit this request to: **Administrative Hearing Commission, Truman State Office Building, Room 640, 301 W. High Street, P.O. Box 1557, Jefferson City, Missouri 65101.**

15. If Licensee has requested review, Licensee and the Board jointly request that the Administrative Hearing Commission determine whether the facts set forth herein are grounds for disciplining Licensee's license and issue findings of act and conclusions of law stating that the facts agreed to by the parties are grounds for disciplining Licensee's license. Effective the date the Administrative Hearing Commission determines that the agreement sets forth cause for disciplining Licensee's license, the agreed upon discipline set forth herein shall go into effect.

18. If Licensee does not request review by the Administrative Hearing Commission, the agreement goes in to effect fifteen (15) days after the document is signed by the Executive Director.

LICENSEE

Sandra R. Stege  
Sandra R. Stege, RDH

Date 8-18-15

BOARD

Brian Barnett  
Brian Barnett  
Executive Director  
Missouri Dental Board

Date 8/20/2015