## LAW OFFICES OF

## PRINDLE, GOETZ, BARNES & REINHOLTZ LLP

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February 3, 2022

Alexis Rivas Investigative Reporter NBCUniversal alexis.rivas@nbcuni.com

Dear Gentleperson Rivas:

I am legal counsel to Khuong Nguyen, DDS. I understand that you contacted Dr. Nguyen asking for comment in response to a media story about a pending California Dental Board investigation involving Dr. Nguyen; and to make sure that your reporting, in your words, is "fair and unbiased." Despite that the subject matter of your reporting is not newsworthy and based on conjecture, Dr. Nguyen is unavailable to speak to you due to patient healthcare privacy laws and because of the pending board investigation, which is subject to court ordered confidentiality.

Because you promised to provide an unbiased and fair report, I trust that your report will include reference to Dr. Nguyen's impeccable and distinguished body of work: that Dr. Nguyen is a graduate of UCSD with a degree in Biology; that Dr. Nguyen is a graduate of USC Dental School; that Dr. Nguyen had completed the UCLA Advanced Education in General Dentistry Program; that Dr. Nguyen had completed a two year pediatric residency at the Lutheran Medical Center, Brooklyn, New York, a hospital based program; and that Dr. Nguyen has achieved Board Certification through the American Board of Pediatric Dentists.

Additionally, your fair and unbiased report will appropriately include mention that Dr. Nguyen has been in private practice in the San Diego community since 2003; that Dr. Nguyen has been licensed in good standing by the Dental Board of California since 1997; that Dr. Nguyen is licensed to perform oral conscious sedation; and that Dr. Nguyen has never been disciplined by the Dental Board of California and has never been sued for dental negligence.

Likewise, your fair and unbiased report will include specific mention that Dr. Nguyen has been providing optimal pediatric dental care in this local community since 2003; that Dr. Nguyen is competent to take on complex pediatric cases that other practitioners are unable to safely treat, including patients who are medically compromised, Down Syndrome, autism, ADHD, Cerebral Palsy, as examples; that Dr. Nguyen has saved lives by diagnosing pathology and referring pediatric patients to proper medical specialists; and that Dr. Nguyen has an altruistic record of

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serving the San Diego community by treating financially underprivileged families through countless hours of pro bono work.

Likewise, I trust that your fair and impartial report will acknowledge and explain that the accusation consists of allegations that have not been proven in a court of law; that a case for professional discipline, such as this accusation, must be proven by clear and convincing evidence to a reasonable degree of medical certainty based on expert witness opinion testimony (the highest standard of proof required under the law); and that Dr. Nguyen has asserted a defense to the accusation denying and disclaiming the claims alleged against him.

I look forward to your fair and unbiased report.

Very truly yours,

PRINDLE, GOETZ, BARNES & REINHOLTZ LLP

BY: DOUGLAS S. DE HERAS