

IN THE COURT OF COMMON PLEAS OF BUTLER COUNTY, PENNSYLVANIA
THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE, LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC, Plaintiff,

Case No.

v.

24-10171

CHARLES SZELESTEY

Defendant.

Type of Document: Complaint in Civil Action

If this is a Complaint, designate whether the case is subject to Compulsory Arbitration (jurisdictional amount \$35,000) or not.

 amount in controversy does not exceed \$35,000
 X amount in controversy exceeds \$35,000
 issues in case are not subject to Compulsory Arbitration

Does this complaint involve consumer credit card collection Y X N

Does this complaint involve residential mortgage foreclosure proceedings Y X N

Filed on behalf of Plaintiffs (Plaintiff / Defendant)

Counsel of record for this party Marc Schneider, Esq (Name of attorney primarily responsible)

Supreme Court I.D. No. 208421

Steele Schneider (Firm Name, if any)

420 Ft. Duquesne Blvd. Ste 500. PGH 15222 (Address)

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2024 FEB 23 PM 2:31

PROthonotary's
OFFICE BUTLER CO.
ENTERED & FILED

**IN THE COURT OF COMMON PLEAS OF BUTER COUNTY, PENNSYLVANIA –
CIVIL DIVISION**

THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC,

No. _____

Plaintiff,

COMPLAINT IN CIVIL ACTION

v.

CHARLES SZELESTEY,

Defendant.

Filed on Behalf of Plaintiffs:

Three Rivers Dental Group Cranberry, LLC
Three Rivers Dental Group Greentree, LLC
Three Rivers Dental Group Greensburg,
LLC

Counsel of Record for this Party:

Marcus B. Schneider, Esquire
PA I.D. No. 208421

STEELE SCHNEIDER
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IN THE COURT OF COMMON PLEAS OF BUTLER COUNTY, PENNSYLVANIA –
CIVIL DIVISION

THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE, LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC,

Case No. _____

Plaintiffs,

v.

CHARLES SZELESTEY,

Defendant.

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Office of Prothonotary, Butler County
Butler County Government Center
124 West Diamond Street
Butler, PA 16001
(724) 284-5214

Butler County Bar Association
240 S. Main Street
Butler, PA 16001
(724) 841-0130

**IN THE COURT OF COMMON PLEAS OF BUTLER COUNTY, PENNSYLVANIA –
CIVIL DIVISION**

THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE, LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC,

No. _____

Plaintiffs,

v.

CHARLES SZELESTEY,

Defendant.

COMPLAINT IN CIVIL ACTION

AND NOW COMES Plaintiffs, Three Rivers Dental Group Cranberry, LLC; Three Rivers Dental Group Greentree, LLC; and Three Rivers Dental Group Greensburg, LLC, by and through their attorney Marcus B. Schneider, Esquire, of STEELE SCHNEIDER, who file this Complaint against Defendant Charles Szelestey, and in support thereof aver as follows.

Parties

1. Plaintiff Three Rivers Dental Group Cranberry, LLC (“TRDG Cranberry”) is a Pennsylvania limited liability company with an office address of 20300 Route 19, Unit 10, Cranberry Township, PA 16066.

2. Plaintiff Three Rivers Dental Group Greentree, LLC (“TRDG Greentree”) is a Pennsylvania limited liability company with an office address of 950 Greentree Road, Suite 300, Pittsburgh, PA 15220.

3. Plaintiff Three Rivers Dental Group Greensburg, LLC (“TRDG Greensburg”) is a Pennsylvania limited liability company with an office address of 121 Donohoe Road, Greensburg, PA 15601.

4. Defendant Charles Szelestey is a Pennsylvania resident with an address of 129 Glade Run Road, Renfrew, PA 16053.

Factual Background

5. TRDG Cranberry, TRDG Greentree, and TRDG Greensburg are separate businesses.

6. Each business engages independent contractor dentists to provide dentistry and related services to each office’s patients.

7. TRDG Cranberry, TRDG Greentree, and TRDG Greensburg make use of the “Three Rivers Dental Group” tradename, which has been in use in the greater Pittsburgh area for more than 15 years.

8. TRDG Cranberry, TRDG Greentree, and TRDG Greensburg invest substantially in marketing with the use of the Three Rivers Dental Group tradename.

9. Plaintiffs market the “Three Rivers Dental Group” trade name with the reasonable expectation of generating patient revenue in excess of its marketing costs.

10. Defendant is a former patient of TRDG Cranberry.

11. Defendant has engaged in an online campaign to damage TRDG Cranberry and interfere with its actual and prospective patient relationships.

12. Defendant has never been a patient of TRDG Greentree, nor has Defendant been a patient of TRDG Greensburg.

13. Yet Defendant's online campaign has also targeted these two practices that have never seen or treated Defendant as a patient.

I. Defendant begins his online campaign to sully Plaintiffs' businesses and the Three Rivers Dental Group tradename.

14. Defendant's online campaign against Plaintiffs began on or about December 13, 2023.

15. On December 13, 2023, Defendant publicly posted on Facebook: "do NOT go to Three Rivers Dental Group in Cranberry or Greentree" (the "12/13 Facebook Post"). Exhibit A.

16. Defendant's 12/13 Facebook Post ended by (1) encouraging others to not visit the two named offices (TRDG Cranberry and TRDG Greentree) ("PLEASE DO NOT GO HERE. BE AWARE OF THESE PEOPLE.") and (2) directing others to a google review site (via hyperlink) where Defendant "like[d] to go . . . to let them know how [he felt]." *Id.*

17. While the 12/13 Facebook Post was made on Defendant's personal Facebook page, he "linked" to a Facebook page connected with the Three Rivers Dental Group tradename.

18. Defendant's public 12/13 Facebook Post generated comments from multiple users.

19. In one of Defendant's responses to a comment to the 12/13 Facebook Post, he warned that "Three Rivers Dental Group, is bad news all over the place. It is down right dangerous." *Id.*

20. In another comment, Defendant stated, "personally, I like leaving places reviews," and provided a hyperlink to a google maps page where users can review TRDGC.

21. On December 16, 2023, Defendant posted one star online reviews on Yelp and Yellow Pages regarding TRDG Greentree, even though he has never been a patient of that office.

22. On December 17, 2023, Defendant posted one star reviews on the Health Grades and WebMD pages of Dr. AnaBianca Hutcheson (Rudolph), even though he had not seen Dr. Hutcheson for treatment in nearly a year.

23. On December 18, 2023, Defendant updated his prior TRDG Greentree Yelp review, stating he does “not recommend this place” and that the “care quality is a solid zero.” Defendant posted the same review onto TRDG Cranberry’s page the next day.

II. TRDG Cranberry contacts Defendant to schedule treatment, but Defendant declines to be seen.

24. In spite of his online activity, on December 19, 2023, TRDGC contacted Defendant through counsel in an effort to schedule him to be seen prior to the Christmas holiday regarding his concerns.

25. In response, Defendant responded that he did not wish to be seen and concluded by stating, “Our business is complete.”

III. Defendant continues to attack Plaintiffs online.

26. In spite of his statement to the contrary, Defendant was far from completed with his efforts to tarnish Plaintiffs’ reputations and interfere with their patient relationships.

27. Defendant continued to frequently (1) post to his personal Facebook page in the weeks following his original 12/13 Facebook Post and (2) post to various public websites for online reviews.

28. On Facebook specifically, Defendant began replying to previous patient reviews and in certain cases, asking these patients to “direct message” him.

29. TRDG Cranberry contacted Facebook and the other online review sites to have false and inaccurate statements and reviews removed to the fullest extent those websites were willing to provide such assistance.

30. In many cases, the websites removed Defendant's posts or reviews, and in most such cases, Defendant posted similar content following the removal or his prior posts.

31. TRDG Greentree and TRDG Greensburg worked with online review sites to have Defendant's reviews of those offices (attached at Exhibit B and Exhibit C) removed given the fact that he was never a patient of either practice.

32. In many instances, when Defendant's posts about TRDG Greentree and TRDG Greensburg were removed, he reposted reviews or comments in substantially the same form.

33. One post during this time period concluded by stating, "i am sure there are state boards who regulate how dentist offices conduct themselves. anyway, in the meantime. for me, this is where I want to let them know how i felt. [(linking to a google review link)] this is not a joke or a game guys. people legitimately need to know about this place. more to come." Exhibit D.

34. Defendant also continued commenting in response to positive reviews by sharing some version of the negative comments he persistently posted during this time period.

35. Around the same time, a reviewer with the name "Gachaverse Catt (G-Verse)" began posting one-star reviews on the TRDGG and TRDGC google review pages, which read "Eww, I went here to make an appointment and the lady was on speakerphone with a patient. Then, Dyllan the hygienist gave himself a 5-starr review on here. You can see it in the reviews below. I walked out." Exhibit E.

36. Around the same time, Defendant directly posted the same allegation to his personal Facebook page. Exhibit F.

37. On January 13, 2024, Defendant posted on his public Facebook page a new cover photo of a vehicle with “3 RIVERS DENTAL SUCKS” written in large letters painted on the rear window and parked in a establishment near the TRDG Cranberry office.



IV. Defendant ramps up his efforts to damage Plaintiffs and interfere with their patient relationships.

38. In or around the start of February 2024, apparently unhappy that his online activity was not having the desired effect, Defendant took his tortious interference to a new level.

39. Around this time, Defendant began impersonating TRDG Cranberry and TRDG Greentree by answering questions submitted by prospective and current customers on Google, often purporting to provide definitive “answers” as if on behalf of the entities. Exhibit G.

- a. On February 2, 2024, in response to a question from a Google user regarding TRDGC’s offering of a free first dental implant, Defendant “answered” the question: “Hi Brian, TRDG does not offer anything remotely close to this. Thank you!” *Id.*

- b. On February 2, 2024, Defendant “answered” a Google user’s question regarding insurance coverage, inquiring as to whether “Highmark wholecare” is accepted: “TRDG does not. No.” *Id.*
 - c. On February 2, 2024, Defendant “answered” a Google user’s question regarding cost estimation for particular procedures: “TRDG has a pretty intense pricing structure. Very overwhelming. I’d call them. (or someone else)”.
 - d. On February 2, 2024, Defendant “answered” a question from a Google user regarding TRDGC’s acceptance of Medicare or Medicaid: “No. They would definitely not do that.” *Id.*
 - e. On February 3, 2024, Defendant “answered” a question concerning a cancellation fee: “Yes they will charge you big time.” *Id.*
 - f. On February 3, 2024, Defendant “answered” a question regarding TRDG’s acceptance of UPMC For You insurance: “TRDG does not.” *Id.*
40. Defendant’s crusade of negative online reviews and social media posts has continued up until the date of this complaint, with the latest posts or disparaging “answers” to prospective or current customers on Google occurring on February 4, 2024.

41. Defendant's most recent one-star review of TRDGG—an office at which he has never been a patient—reads like an artificial intelligence-generated review produced by prompting the AI to use elaborate and flowery language for dramatic effect:

Three Rivers Dental Group: Greentree

950 Greentree Rd STE 300, Pittsburgh, PA



4.6 ☆☆☆☆ 693 reviews ⓘ



CJ Szelestey
2 reviews



☆ a week ago | **NEW** |

Subjected to abysmal treatment, I found myself confined to a chair, my extracted tooth callously displayed on the table. The audacity to demand a \$110 cash payment as my ransom for liberation was nothing short of egregious. Unfazed, I opted for a debit card transaction, departing with my extracted tooth nonchalantly tucked in my pocket.

In retaliation, I penned a scathing online review, only to have their legal representative brandish threats. As a bizarre conciliation gesture, a mysterious \$55 check materialized, bereft of any elucidating correspondence. Intricately stamped with minuscule, densely packed, and barely discernible text, the check coyly declared my forfeiture of legal recourse upon endorsement.

Enduring a trifecta of futile attempts to reset my dental crown, they persistently advocated an exorbitant implant, an endeavor thwarted by another competent dentist who promptly rectified the issue. The insidious agenda to exploit a sound tooth for financial gain epitomized their avaricious modus operandi. In an attempt to manipulate public perception, they resorted to compensating me for a five-star review, a transaction subsequently revised. Their hygienist, "D," shamelessly self-appraised to suppress my accolades.

Compounding their transgressions, the wanton disregard for HIPAA regulations manifested in unabashedly broadcasting sensitive information on speakerphone. The consultation "room," a misnomer in its openness, served as a theater for coercive discussions on payment plans and upselling.

Moreover, their predilection for invasive procedures, eschewing anything short of nerve treatments, reflected an alarming lack of patient-centric care. The disdain palpable in their reluctance to perform routine cleanings became apparent upon each appointment scheduling. This establishment, on its most favorable day, exudes an air of dubious ethics. A perusal of reviews on reputable platforms such as BBB and Yelp underscores a pattern of subterfuge, with their calculated manipulation of public perception.

The unscrupulous tactics employed by their legal counsel undoubtedly silences many dissidents; however, I stand undeterred, unwavering in my pursuit of justice. An institution such as yours, purporting to provide healthcare, sorely requires comprehensive training in the art of human decency. An earnest wish lingers for a regulatory inspection to cast a discerning eye upon such lamentable practices. Shame befalls you, TRDG, for your dereliction of ethical responsibility.

V. Defendant has attempted to extort financial payment from Plaintiffs.

42. Following his initial response to Plaintiffs’ counsel’s December 19, 2023 contact, Defendant emailed Plaintiffs’ counsel requesting that “[t]o expedite the resolution process, I suggest an amount of \$10,110. If TRDG finds this amount unacceptable, I am open to a reasonable counteroffer.”

43. On February 2, 2024, Defendant posted a copy of a Pennsylvania Office of Attorney General complaint to his personal Facebook page, excerpting the resolution he requested in filing his complaint:

Filing a complaint with the Office of Attorney General does not preserve your appeal rights pursuant to your insurance contract or any applicable laws. To preserve your rights you must file an appeal (complaint or grievance) directly with your health insurer/administrator in conformance with the terms of your coverage.

What Specific Resolution Are You Seeking In Order To Settle Your Complaint?

My \$830 back.
My \$110 back.
Refunds for the two appointments where TRDG only either temporarily cemented my crown, or did nothing but charge my insurance company.
TRDG to pay my current DDS for exam / X-Ray / fixing my crown (they can do a build up)
An apology for being placed in the chair and told I could not leave the building.

Optional Information

How did you hear about us?

ChatGPT

Exhibit H.

44. His comment to this post stated, “Three Rivers Dental Group, in case you want to get started on this stuff.” *Id.*

**Count I
Tortious Interference with Actual and Prospective Business and Contractual Relations
Plaintiffs against Defendant Charles Szelestey**

45. While Plaintiff TRDG Cranberry undertook good faith effort to address Defendant’s concerns based upon his personal experience at TRDG Cranberry, once Defendant

indicated that his business with TRDG Cranberry was “done,” Plaintiff TRDG Cranberry has otherwise not engaged Defendant in spite of his online campaign against it.

46. Plaintiffs TRDG Greentree and TRDG Greensburg have never engaged Defendant, in spite of his online campaign against them.

47. Defendant has only increased his online activity directed against the business and contractual relations of Plaintiffs and their patients, indicating a clear design to go well beyond presenting a personal review to the public: Defendant is committed to damaging Plaintiffs’ reputation and damaging its actual and prospective customer relations.

48. Defendant has attempted to make direct contact with patients leaving positive reviews, and he has gone so far as to provide answers to questions of actual or prospective patients, at times as if he is representing Plaintiffs.

49. Defendant has no legal justification for his campaign against Plaintiffs.

50. Plaintiffs incur substantial expense in connection with their marketing efforts, including online advertisement and curating their digital presence and reputation.

51. Defendant’s reviews, statements, interactions with patients, and “answers” to prospective or existing customers’ questions on webpages associated with Plaintiffs are designed to cause financial harm to them.

52. Upon information and belief, Defendant’s conduct is causing actual patients to leave Plaintiffs’ practices, and it is contributing to prospective patients’ decision not to visit the practices.

53. Plaintiffs are suffering untold harm to its business in the form of loss of potential future patients, interference with or loss of existing patients, and interference with prospective employment relationships.

54. Plaintiffs request damages in an amount to be determined at trial and in excess of local arbitration limits.

55. Plaintiffs request preliminary and permanent injunctive relief to stop the irreparable harm occurring based upon the continued conduct of Defendant and the prior posts and “answers” that remain available for all to see on aforesaid websites.

56. Unless and until Defendant is preliminarily and permanently enjoined from the foregoing conduct, Plaintiff is and will continue to be irreparably harmed by:

- a. Loss of goodwill, confidence, and trust of its customers;
- b. Loss of business and professional reputation;
- c. Incalculable lost profits; and
- d. Incalculable loss of employment opportunities.

57. Plaintiff has no adequate remedy at law to this ongoing harm.

WHEREFORE, Plaintiffs respectfully request damages and the following: a Special Injunction be issued immediately, and preliminarily thereafter until final hearing, ordering Defendant to cease his interference with Plaintiffs’ actual and prospective patient relationships and ordering Defendant to remove all posts leading to such interference reflected in Exhibits A-H.

**Count II
Defamation Per Se**

Plaintiffs TRDG Greentree and TRDG Greensburg against Defendant Charles Szelestey

58. Defendant was never a patient at Plaintiff TRDG Greentree, nor has he been a patient at Plaintiff TRDG Greensburg.

59. Thus, all online comments made by Defendant about the quality and level of service provided by Plaintiffs TRDG Greentree and TRDG Greensburg are false and defamatory.

60. Defendant's statements regarding Plaintiffs TRDG Greentree and TRDG Greensburg are direct attacks on the moral and business reputation of the practice.

61. Plaintiffs TRDG Greentree and TRDG Greensburg are suffering untold harm to their businesses in the form of loss of potential future patients, interference with or loss of existing patients, and interference with prospective employment relationships.

62. Plaintiffs TRDG Greentree and TRDG Greensburg request damages in an amount to be determined at trial and in excess of local arbitration limits.

63. Plaintiffs TRDG Greentree and TRDG Greensburg request preliminary and permanent injunctive relief to stop the irreparable harm occurring based upon the continued conduct of Defendant and the prior posts and "answers" that remain available for all to see on aforesaid websites associated with TRDG Greentree and TRDG Greensburg.

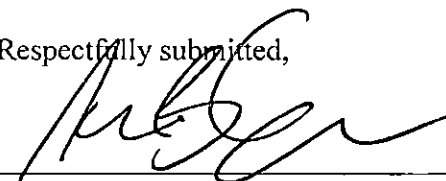
64. Unless and until Defendant is preliminarily and permanently enjoined from the foregoing conduct, Plaintiffs are and will continue to be irreparably harmed by:

- a. Loss of goodwill, confidence, and trust of its customers;
- b. Loss of business and professional reputation;
- c. Incalculable lost profits; and
- d. Incalculable loss of employment opportunities.

65. Plaintiff has no adequate remedy at law to this ongoing harm.

WHEREFORE, in addition to appropriate monetary relief, Plaintiffs TRDG Greentree and TRDG Greensburg respectfully request the following: a Special Injunction be issued immediately, and preliminarily thereafter until final hearing, ordering Defendant to remove all defamatory online statements regarding TRDG Greentree and TRDG Greensburg.

Respectfully submitted,



Marcus B. Schneider, Esquire
PA I.D. No. 208421
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Pittsburgh, PA 15222
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(412) 235-7693/facsimile
marcschneider@steeleschneider.com

Exhibit A



CJ Leigh

1 mutual friend

Add friend

Message

Posts About Friends Photos Videos Reels More

Intro

i am the dreamer. you are the dream.

- Mechanical Designer III at Omnicell
- Studied at ITT Technical Institute
- Went to Jimtown High School
- Lives in Renfrew, Pennsylvania
- From Elkhart, Indiana
- Married to Cristy Leigh
- Pronounces name BLOO FLURRP

Posts

Filters

Pinned post



CJ Leigh

December 13 at 9:24 AM · 🌐

do NOT go to Three Rivers Dental Group in Cranberry or Greentree. They left me tooth and money-less. Jacked me up. Then, after spending \$12k, my insurance rejected an appointment, so I owed them \$110. The lady put me in a room and told me a could not leave or see the doctor until I paid \$110 in CASH. I put my tooth in my pocket and walked out. They have an F with the BBB. I wish I would have looked them up. Guys, I could go on and on. PLEASE DO NOT GO HERE. BE AWARE... See more



Photos

See all photos



Exhibit B

6:59



January 30
9:42 PM

Edit



All

Maps

Images

Shopping

Videos

News

Books

Results for **Green Tree, PA** · Choose area

Three Rivers Dental Group: Greentree

4.6 ★★★★★ (682)

Dentist in Green Tree, Pennsylvania ·

Closed



Overview

Reviews

Photos

Services

By

Google review summary



4.6 ★★★★★
(682)



Reviews

✓ All

sedation 24

crown 24

x-rays 23

root canal 21

+6

Sort by

Most relevant

✓ Newest

Highest

Low



6:58



January 30
9:42 PM

Edit



4.0 (682)

Reviews

- ✓ All
- sedation 24
- crown 24
- x-rays 23
- root canal 21
- +6

Sort by

- Most relevant
- ✓ Newest
- Highest
- Lowest

 **Ana Rudolph** 7 reviews 

★★★★★ 6 years ago

Describe your experience

 **CJ S** Local Guide · 54 reviews · 3 photos 

★★★★★ an hour ago **NEW**


 **CJ Szelestey** 

★★★★★ 4 hours ago **NEW**

Exhibit C


Three Rivers Dental Group: Greensburg


121 Donohoe Rd, Greensburg, PA

 [Edit your review](#)


4.5  548 reviews 


- Most relevant
- Newest
- Highest
- Lowest

 **Jorden Weinzierl**
1 review
★★★★★ 4 years ago - [Edit](#) [Delete](#)

 **CJS**
Local Guide · 51 reviews · 3 photos
★★★★★ 5 minutes ago **NEW**

they put my tooth on the tray and then told me i couldn't leave or see the doc until i paid them \$110 cash. i walked out with my tooth in my pocket. i left a negative review and was contacted by their lawyer for it. after my review was posted, their hygienist posted a 5-star review for himself. obviously, to push my honest review down. then, they sent me a \$55 check with no accompanying correspondence. only a blurry stamp with tiny, tightly spaced text that claims i can not sue them if i sign it. completely unethical behavior. please look them up at the BBB before you decide. that is all, for now.

 Like

 **Alyssa Lawson**
1 review
★★★★★ 4 hours ago **NEW**

everyone here did a really great job at keeping me calm! they're all very nice & made sure to put my fears

three-rivers-dental-grou... 3/5 Weema Doctor · 2 reviews

Windows taskbar with search and application icons.



Exhibit C

Exhibit D



CJ Leigh



Posts

Photos

Reels

**CJ Leigh is at Three Rivers Dental Group.** ...

4d · Greensburg · 🌐

my insurance rejected a previous appointment, so i legitimately owed Three Rivers Dental Group \$110. i was unaware of this. they did not send a bill. my tooth broke. i went in to get it fixed and the lady cornered me in a room and told me, "you can't leave until you pay \$110 in CASH" i started leaving, she paused in the doorway a little too long for my comfort. she breaks off, goes to her side of the desk [still loudly telling me i can not leave until i pay]. i went out of the door, around the front of the desk. luckily, i am smarter than her. i realized there are other ways to pay than CASH. i asked her if i could use a debit card to settle my debt. i did and walked out with my tooth in my pocket. i am most likely going to run this past a lawyer or two. i am sure there are state boards who regulate how dentist offices conduct themselves. anyway, in the meantime. for me, this is where i went to let them know how i felt. <https://maps.app.goo.gl/KuFetq9QL62TtgGRA>

this is not a joke or a game guys.

people legitimately need to know about this place.

more to come.

Exhibit E

6:52



January 13
11:21 AM

Edit



★★★★★ 2 days ago **NEW**

First time getting a bridge and the experience was easy and pain free



amber shields

7 reviews · 7 photos



★★★★★ 3 days ago **NEW**

Great services! I highly recommend!



Gachaverse Catt (G-Verse)

2 reviews



★★★★★ 3 days ago **NEW**

Eww, I went here to make an appointment and the lady was on speakerphone with a patient. Then, Dyllan the hygienist gave himself a 5-star review on here. You can see it in the reviews below. I walked out.



Overview

Reviews

Photos

Services

By



K

Kara Vanderziel

4 reviews · 1 photo



★★★★★ 16 hours ago **NEW**

I had a great experience at Three Rivers Dental in Cranberry today. The staff was super friendly and went out of their way to accommodate my needs. They were really flexible with scheduling my appointment and everything went smoothly during my visit. If you're looking for a friendly, no hassle dental practice- this place is great!



1



A

AI1027 Dgna

2 reviews



★★★★★ a day ago **NEW**

C

christine mccune

2 reviews



★★★★★ 2 days ago **NEW**

Soooooo kind and sooo sweet!!! Dr Wallick is the best!!!



1



G

Gachaverse Catt (G-Verse)

1 review



★★★★★ 2 days ago **NEW**




Christa Rogers


4 reviews




Exhibit E

Exhibit F

<  **CJ Leigh** is 😞 feeling irritated. ...
12h · 🌐


 **CJ Leigh**
Mary Crandall

 **D**
5 reviews
★★★★★ 12 hours ago **NEW**


The staff is so friendly and makes everyone feel so comfortable with anything you need done. Dr. Wallick is the best dentist around!


👍 1 ➦

54m Like

 **CJ Leigh**
Mary Crandall that guy went and got himself a name change.

54m Like

 **CJ Leigh**
D got a name change. You posted that review, under that name publicly. If you would have deleted your review. I would have deleted this post. Instead, you continue to act a fool and I continue to call you out for it. Three Rivers Dental Group .. shame. on. you.

 **D**
5 reviews
★★★★★ 12 hours ago **NEW**

The staff is so friendly and makes everyone feel so comfortable with anything you need done. Dr. Wallick is the best dentist around!

👍 1 ➦

49m Like

Exhibit F



CJ Leigh is 😡 feeling irritated.



3h · 🌐

... Three Rivers Dental Group is giving itself 5 star reviews to push my review down the list. slimy and dishonest on the best day there is. again, shame on you.

Dyllan Ferringer

Reviews

★★★★ an hour ago **NEW**

The staff is so friendly and makes everyone feel so comfortable with anything you need done. The best dentist around!

Like

LinkedIn · Dyllan Ferringer

10+ followers

Dyllan Ferringer - Three Rivers Dental Group

Lebanon, Pennsylvania, United States · Dental Hygienist · Three Rivers Dental Group

View Dyllan Ferringer's profile on LinkedIn, the world's largest professional community.

Job listed on their profile. See the complete profile ...



Like



Send



Share

😡😡 10

Most relevant ▾



Kyle Griffin

lol

3h Like

1



Yvonne McCourt

Shame on them!

5m Like

Exhibit G

Three Rivers Dental Group: Cranberry

20300 Rte 19, Cranberry Twp, PA

← All questions

Brian Turek

I understand that you offer your first dental implant free how is that possible

 1

Steele Schneider Reception

Local Guide · ·

Answer the question

Your posts will appear publicly with your profile name and picture.
Your posts will appear on Google services across the web, like Maps and Search, and on third-party sites and apps that use Google services.
Your posts must comply with Google's policies. [Read more](#)

CJ S

Local Guide · 59 reviews · 3 photos

4 days ago

Hi Brian,

TRDG does not offer anything remotely close to this.

Thank you!

 2

M L

3 years ago

Exhibit G

Three Rivers Dental Group: Greentree

Ask a question

950 Greentree Rd STE 300, Pittsburgh, PA

 Like

1 more answer

Was this dental facility highlighted on Dateline NBC?



 1  Answer

CJ S
Local Guide · 59 reviews · 3 photos



3 days ago
yep

 Like

do you accept Highmark wholecare



 Like  Answer

CJ S
Local Guide · 59 reviews · 3 photos



3 days ago
TRDG does not. No.

 Like

Exhibit G

Three Rivers Dental Group: Greentree

950 Greentree Rd STE 300, Pittsburgh, PA

Ask a question

CJS

Local Guide · 59 reviews · 3 photos

4 days ago

No. They definitely would not do that.

 Like

1 more answer

I need dentures. could you give me an estimate of the cost?

 2  Answer

CJS

Local Guide · 59 reviews · 3 photos

4 days ago

TRDG has a pretty intense pricing structure. Very overwhelming. I'd call them. (or someone else)

 1

Do you accept Highmark BC/BS Security Blue HMO-POS ?

 2  Answer

Do you take usme for you

Exhibit G

Three Rivers Dental Group: Greentree

950 Greentree Rd STE 300, Pittsburgh, PA

← All questions

Mike Jones

Do you take medicare/medicaid



4

Steele Schneider Reception

Local Guide · ·

Answer the question

Your posts will appear publicly with your profile name and picture. Your posts will appear on Google services across the web, like Maps and Search, and on third-party sites and apps that use Google services. Your posts must comply with Google's policies.[Read more](#)

POST

CJ S

Local Guide · 59 reviews · 3 photos



4 days ago

No. They definitely would not do that.

Like

Three Rivers Dental Group: Greentree (Owner)

5 years ago



Hi there. At Three Rivers Dental Group, we do not take any state-funded insurances.

Exhibit G

Three Rivers Dental Group: Greentree

950 Greentree Rd STE 300, Pittsburgh, PA
← All questions

Jeffrey Cushin
Do you take upmc for you

2

Steele Schneider Reception
Local Guide · ·

Answer the question

Your posts will appear publicly with your profile name and picture.
Your posts will appear on Google services across the web, like Maps and Search, and on third-party sites and apps that use Google services.
Your posts must comply with Google's policies. [Read more](#)

CJ S
Local Guide · 59 reviews · 3 photos

3 days ago
TRDG definitely wouldn't do that.

Like

Three Rivers Dental Group: Greentree (Owner)
5 years ago

Hi there - unfortunately, we do not accept any state-funded insurances.

Exhibit G

Exhibit H

CJ's Post



CJ Leigh

February 2 at 3:35 PM · 🌐



i wonder how many times the office of attorney general gets 'ChatGPT' in the 'How did you hear about us?'

Filing a complaint with the Office of Attorney General does not preserve your appeal rights pursuant to your insurance contract or any applicable laws. To preserve your rights you must file an appeal (complaint or grievance) directly with your health insurer/administrator in conformance with the terms of your coverage.

What Specific Resolution Are You Seeking In Order To Settle Your Complaint?

My \$830 back.
My \$110 back.
Refunds for the two appointments where TRDG only either temporarily cemented my crown, or did nothing but charge my insurance company.
TRDG to pay my current DDS for exam / X-Ray / fixing my crown (they can do a build up)
An apology for being placed in the chair and told I could not leave the building.

Optional Information

How did you hear about us?

ChatGPT

🗨️ 3

3 comments

Like

Share

Most relevant



CJ Leigh

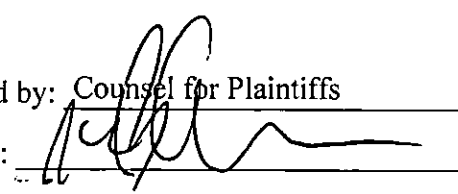
Three Rivers Dental Group, in case you want to get started on this stuff.

What Specific Resolution Are You Seeking In Order To Settle Your Complaint?
My \$830 back.
My \$110 back.
Refunds for the two appointments where TRDG only either temporarily cemented my crown, or did nothing but charge my insurance company.
TRDG to pay my current DDS for exam / X-Ray / fixing my crown (they can do a build up)
An apology for being placed in the chair and told I could not leave the building.
Training for TRDG staff on how to treat people with respect.
to pay the amount of TRDG's lawsuit

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Counsel for Plaintiffs

Signature:  _____

Name: Marcus B. Schneider, Esq.

Attorney No. (if applicable): 208421

IN THE COURT OF COMMON PLEAS OF BUTLER COUNTY, PENNSYLVANIA –
CIVIL DIVISION

THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE, LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC,

No. _____

Plaintiffs,


v.

CHARLES SZELESTEY,

Defendant.

VERIFICATION

I verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, and that the averments have been reviewed with my I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.



Three Rivers Dental Group Cranberry, LLC

Dated: 2/20/2024

IN THE COURT OF COMMON PLEAS OF BUTLER COUNTY, PENNSYLVANIA –
CIVIL DIVISION

THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE, LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC,

No. _____

Plaintiffs,


v.

CHARLES SZELESTEY,

Defendant.

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Three Rivers Dental Group Greentree, LLC

Dated: 2/20/2024

IN THE COURT OF COMMON PLEAS OF BUTLER COUNTY, PENNSYLVANIA –
CIVIL DIVISION

THREE RIVERS DENTAL GROUP
CRANBERRY, LLC; THREE RIVERS
DENTAL GROUP GREENTREE, LLC; and
THREE RIVERS DENTAL GROUP
GREENSBURG, LLC,

No. _____

Plaintiffs,

v.

CHARLES SZELESTEY,

Defendant.

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Three Rivers Dental Group Greensburg, LLC

Dated: 2/20/2024