

Before The
Louisiana State Board Of Medical Examiners

*In The Matter of Myron Moorehead, M.D.
and Janos Voros, M.D.*

(CERTIFICATES NO. 04222R AND NO. 010032)

DOCKET NOS. 91-A-009
AND 91-A-008

**STIPULATION AND AGREEMENT
FOR ENTRY OF CONSENT ORDER**

THIS STIPULATION AND AGREEMENT is made and executed by Myron Moorehead, M.D. (Dr. Moorehead) and Janos Voros, M.D. (Dr. Voros), physicians licensed to practice medicine in the state of Louisiana, with and in favor of the Louisiana State Board of Medical Examiners ("Board").

1. *Acknowledgments and Stipulations.* Drs. Moorehead and Voros hereby acknowledge, stipulate and agree that:

- (a) At all times pertinent, and specifically during September and October of 1989, Drs. Moorehead and Voros together operated the Lakeside Women's Laser and Fertility Institute in Metairie, Louisiana.
- (b) On September 7 and September 10, 1989, these physicians caused to be published in the Times-Picayune Newspaper a certain advertisement entitled "Medical Update" which alleged that the drug Lupron (leuprolide acetate) had been approved by the United States Food and Drug Administration for use in shrinking fibroid tumors in women, thus preventing hysterectomies due to large fibroid tumors.
- (c) This same advertisement was also placed in the St. Tammany News-Banner on September 24, 1989 and the Kentwood News on October 19, 1989.
- (d) At the times these advertisements were placed in the publications indicated, Lupron was not, in fact, approved by the FDA for the use described. The only approved use for Lupron at the relevant times was for the palliative treatment of advanced prostate cancer. Pursuant to Administrative Complaint filed herein, it

is alleged that these representations made by Drs. Moorehead and Voros constituted a violation of the Louisiana Medical Practice Act and particularly L.S.A. - R.S. 37:1285(A)(7) in that the physicians had engaged in the solicitation of patients through advertisements which were fraudulent, false, deceptive, or misleading. Proof of such facts would establish lawful cause under the Louisiana Medical Practice Act for the Board to revoke or otherwise restrict the medical licenses held by Drs. Moorehead and Voros to practice medicine in the state of Louisiana.

- (e) Pursuant to the Louisiana Medical Practice Act and the Louisiana Administrative Procedure Act, Drs. Moorehead and Voros would be entitled, prior to disciplinary action against their medical licenses, to evidentiary hearing on the charges of said Administrative Complaint, to be represented therein by legal counsel of their choice, to call witnesses and present evidence on their own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based on written findings of fact and conclusions of law, pursuant to the applicable provisions of the Administrative Procedure Act, L.S.A. - R.S. 49:955-965.

2. *Waiver of Rights and Consent to Entry of Order.* Notwithstanding their right to formal administrative hearing and a decision thereon, in recognition of the stipulations set forth herein above, and toward final disposition of the adjudication now pending in this matter and in lieu of further prosecution of administrative proceedings, Drs. Moorehead and Voros hereby waive their right to formal administrative hearing and a decision thereon by the Board and consent to entry of an order compelling Drs. Moorehead and Voros to publish a retraction of the assertion set forth in the complained-of advertisements in each of the publications in which the advertisements were originally placed. The text of the retraction to be published is set forth in Exhibit A, attached hereto and made a part hereof. Said retraction shall be published at least once in each of the three publications identified above within 45 days of the date of this Order.

3. *Effect of Violation of Order.* Should Drs. Moorehead and Voros fail to comply with the Order set forth below, such violation will be deemed just cause for suspension and revocation of the medical licensure of Myron Moorehead, M.D. and Janos Voros, M.D., or for such other disciplinary action as the Board deems appropriate, as if such violations were enumerated among the causes provided for by L.S.A. - R.S. 37:1285.

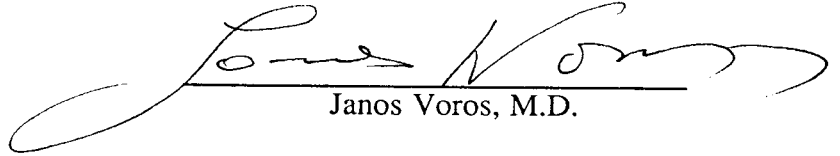
4. *Acceptance by Board; Effect of Agreement.* Subject to and upon acceptance and execution of the stipulation and agreement by the Board, the Administrative Complaint presently pending before the Board for adjudication shall, pursuant to L.S.A. - R.S. 49:955(D) be dismissed with prejudice by order of the Board.

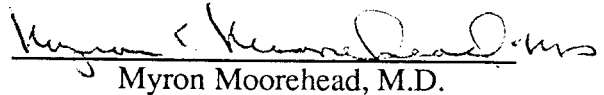
Considering the foregoing,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED, that Myron Moorehead, M.D. and Janos Voros, M.D. shall publish at least once in the St. Tammany News-Banner, the Times-Picayune and the Kentwood News, the text of the retraction attached hereto as Exhibit A. Following such publication, Drs. Moorehead and Voros shall supply to the Board written confirmation that the publication has occurred and the date of the publication.

IT IS FURTHER ORDERED, that should Myron Moorehead, M.D. and Janos Voros, M.D. violate the Order of the Board, such violations shall be deemed just cause for suspension and revocation of the medical licensure of Myron Moorehead, M.D. and Janos Voros, M.D. or for such other disciplinary action as the Board deems appropriate as if such violations were enumerated among the causes provided for by L.S.A. - R.S. 37:1285.

IN WITNESS WHEREOF, Myron Moorehead, M.D. and Janos Voros, M.D. have subscribed to this stipulation and agreement this 18th day of July, 1991.

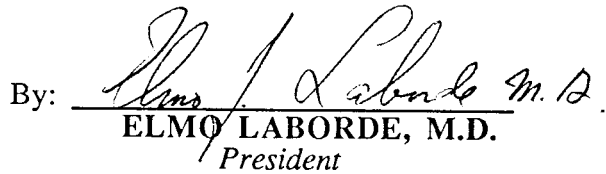

Janos Voros, M.D.


Myron Moorehead, M.D.

ACCEPTANCE

APPROVED, ACCEPTED AND ORDERED by the Louisiana State Board of Medical Examiners, this 18 day of July, 1991. It is further ordered that the Administrative Complaint pending against respondents, Myron Moorehead, M.D., and Janos Voros, M.D. is DISMISSED with prejudice.

**LOUISIANA STATE BOARD OF
MEDICAL EXMINERS**

By: 
ELMO LABORDE, M.D.
President