

F-0052

IN THE MATTER OF THE) (BEFORE THE
COMPLAINT AGAINST) (
) (TEXAS STATE BOARD
JOHN PARKS TROWBRIDGE, M.D.,) (
RESPONDENT) (OF MEDICAL EXAMINERS

COMPLAINT

TO THE HONORABLE TEXAS STATE BOARD OF MEDICAL EXAMINERS:

COMES NOW, the Texas State Board of Medical Examiners (the "Board"), by and through its Hearings Division, making this Complaint against John Parks Trowbridge, M.D. (the "Respondent"), concerning his violation of the Medical Practice Act (the "Act"), Article 4495b of the Revised Civil Statutes of the State of Texas. This relief is necessary to protect the health of the citizens of the State of Texas as mandated by Section 1.02 of the Act, and in support thereof would show the following:

I

The Respondent was previously issued a Texas medical license, number F-0052, by the Texas State Board of Medical Examiners, which was in full force and effect at all times relevant to this proceeding. All jurisdictional events required prior to the filing of this Complaint have been satisfied.

II

The Texas State Board of Medical Examiners is informed and believes, and upon such information and belief, charges and alleges that:

Count I

The Respondent advertised Face 2 Nonsurgical Face Lift in a brochure

a. "Nonsurgical Face Lift" is a conflict in terms. If the procedure is a face lift then it is a surgical procedure, if the procedure is nonsurgical then it is not a fact lift;

b. the treatment is a "chemical peel";

c. "Based on the method approved as effective by the American Medical Association,..." the American Medical Association does not approve methods of treatment generally and has not approved this method specifically, and is false;

d. "FACE 2 tm slows down aging" - is not supported by any medical evidence and is false;

e. There is no identification of ladies in the photographs as patients who have undergone the treatment and which picture is "before" and which picture is "after", leaving the impression that the more flattering picture is a result of the treatment and is misleading and deceptive;

All of which are a violation of section 3.08(6) of the Medical Practice Act, use of any advertising statement that is false, misleading, or deceptive.

Count II

The Respondent advertised that chelation therapy will

a. "...make stronger bones, partly because toxic metals that are present in the bone structure (in place of the usual calcium) are removed and new bone is made with stronger calcium in place" is unsupported by medical evidence and is misleading;

b. reverse or delay aging and disease changes, so as to advertise chelation therapy as the "Fountain of Youth", is misleading and deceptive;

c. "75-80 out of 100 patients having excellent results" is unsupported by any medical or statistical evidence and there is no objective standards by which to define "excellent results" and is deceptive;

d. EDTA interrupting "free radical attacks" is unsupported by any medical evidence as to how EDTA causes changes to prevent or preclude atherosclerosis, arthritis, cancer, inflammation, and allergies and is deceptive;

All of which are a violation of section 3.08(6) of the Medical Practice Act, use of any advertising statement that is false, misleading, or deceptive.

Count III

Cytotoxic allergy testing advertising that was misleading as to what the indications are for being cytotoxically tested. Among those cited in the advertisement were when there were obvious allergies or allergy symptoms, and when two or three physicians can not tell the patient what is wrong with the patient and being overweight;

All of which are a violation of section 3.08(6) of the Medical Practice Act, use of any advertising statement that is false, misleading, or deceptive.

III

The Respondent by his actions, conduct and behavior has violated section 3.08(6) of the Medical Practice Act of Texas.

The Respondent's violation of section 3.08(6) of the Act is grounds for cancellation, revocation or suspension of the Respondent's license to practice medicine in the State of Texas pursuant to section 4.01 of the Act.

The Respondent's violation of section 3.08(6) of the Act is grounds for the Board to enter an order imposing other means of discipline upon the Respondent pursuant to section 4.12 of the Act.

The Respondent's violation of section 3.08(6) of the Act resulting in the cancellation, revocation or suspension of the Respondent's Texas medical license or the imposition of other means of discipline may be probated pursuant to section 4.11 of the Act.

WHEREFORE, PREMISES CONSIDERED, it is prayed that a hearing on this complaint be held before the Texas State Board of Medical Examiners and that the Board enter its order herein to (1) cancel,

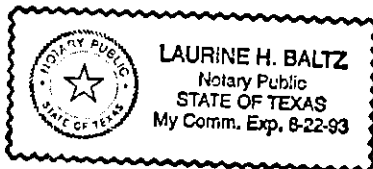
revoke or suspend the Respondent's medical license; (2) impose other means of discipline, or (3) probate the cancellation, revocation, suspension or the Respondent's Texas medical license, or the imposition of other means of discipline.

Respectfully submitted,

Arnoldo G. Garza
Arnoldo G. Garza
Director of Hearings

THE STATE OF TEXAS)
)
COUNTY OF TRAVIS)(

SUBSCRIBED AND SWORN to before me by the said Arnoldo G. Garza on this the 29th day of January, 1990.



Laurine H. Baltz
Notary Public, State of Texas

Filed with the Texas State Board of Medical Examiners on this the 29th day of January, 1990.

G. V. Brindley, Jr.
G. V. Brindley, Jr., M.D.
Executive Director
Texas State Board of Medical
Examiners