

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation)	
Against:)	
)	
)	
LAWRENCE ROBERT CRONIN, M.D.)	Case No. 8002015011000
)	
Physician's and Surgeon's)	
Certificate No. G54386)	
)	
Respondent)	
_____)	

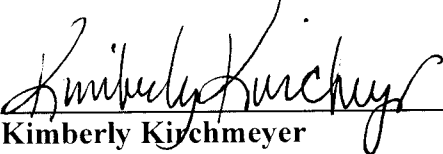
DECISION

The attached Stipulated Surrender of License is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on August 28, 2015

IT IS SO ORDERED August 21, 2015 .

MEDICAL BOARD OF CALIFORNIA

By: 

Kimberly Kirchmeyer
Executive Director

1 KAMALA D. HARRIS
Attorney General of the State of California
2 JANE ZACK SIMON (SBN 116564)
Supervising Deputy Attorney General
3 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102
4 Telephone: (415) 703-5544
Fax: (415) 703-5480

5 *Attorneys for Complainant*
6 *Medical Board of California*

7
8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 **In the Matter of the First Amended Accusation**
12 **Against:**

13 **LAWRENCE ROBERT CRONIN, M.D.**
14 7333 E. Tanque Verde Road
Tucson, AZ 85715

15 Physician's and Surgeon's Certificate No. G54386

Case No.: 800-2015-011000

**STIPULATED SURRENDER OF
LICENSE**

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding, that the following matters are true:

19 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical
20 Board of California. This action has at all times been maintained solely in the official capacity of
21 the Executive Director of the Medical Board of California, who is represented by Kamala D.
22 Harris, Attorney General of the State of California, by Jane Zack Simon, Supervising Deputy
23 Attorney General.

24 2. Lawrence Robert Cronin, M.D. (Respondent) is represented in this proceeding by
25 Gregory Abrams of Abrams Health Law, 6045 Shirley Drive, Oakland, CA 94611.

26 3. Respondent has received, read, discussed with counsel and understands the First
27 Amended Accusation (Accusation) which is presently on file and pending in case number 800-
28 2015-011000 a copy of which is attached as Exhibit A.

1 4. Respondent has carefully read, discussed with counsel and understands the charges
2 and allegations in the Accusation. Respondent also has carefully read, discussed with counsel
3 and understands the effects of this Stipulated Surrender of License (Stipulation.)

4 5. Respondent is fully aware of his legal rights in this matter, including the right to a
5 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
6 his own expense; the right to confront and cross-examine the witnesses against him; the right to
7 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
8 the attendance of witnesses and the production of documents; the right to reconsideration and
9 court review of an adverse decision; and all other rights accorded by the California
10 Administrative Procedure Act and other applicable laws.

11 6. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
12 every right set forth above.

13 7. Respondent agrees that based on the action taken by the Arizona Medical Board as
14 alleged in the Accusation, cause exists to discipline his California physician's and surgeon's
15 certificate pursuant to Business and Professions Code sections 141 and 2305. Respondent wishes
16 to surrender his California license at this time.

17 8. Pursuant to section 2224(b) of the Business and Professions Code, this Stipulation
18 for Surrender of License shall be subject to the approval of the Board. Respondent understands
19 and agrees that the Medical Board's staff and counsel for Complainant may communicate directly
20 with the Board regarding this Stipulation without notice to or participation by Respondent or his
21 counsel. By signing this Stipulation, Respondent understands and agrees that he may not
22 withdraw his agreement or seek to rescind the Stipulation prior to the time the Board considers
23 and acts upon it. In the event that this Stipulation is rejected for any reason by the Board, it will
24 be of no force or effect for either party. The Board will not be disqualified from further action in
25 this matter by virtue of its consideration of this Stipulation.

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1 9. Upon acceptance of this Stipulation by the Board, Respondent understands that he
2 will no longer be permitted to practice as a physician and surgeon in California, and also agrees to
3 surrender and cause to be delivered to the Board any license and wallet certificate in his
4 possession before the effective date of the decision.

5 10. The admissions made by Respondent herein are only for the purposes of this
6 proceeding, or any other proceedings in which the Medical Board or other professional licensing
7 agency is involved, and shall not be admissible in any other criminal or civil proceeding.

8 11. Respondent fully understands and agrees that if he ever files an application for
9 relicensure or reinstatement in the State of California, the Board shall treat it as a petition for
10 reinstatement, and Respondent must comply with all laws, regulations and procedures for
11 reinstatement of a revoked license in effect at the time the petition is filed.

12 12. Respondent understands that he may not petition for reinstatement as a physician
13 and surgeon for a period of three (3) years from the effective date of his surrender. Information
14 gathered in connection with First Amended Accusation number 800-2015-011000 may be
15 considered by the Board in determining whether or not to grant the petition for reinstatement.
16 For the purposes of the reinstatement hearing, the allegations contained in First Amended
17 Accusation number 800-2015-011000 shall be deemed to be admitted by Respondent, and
18 Respondent waives any and all defenses based on a claim of laches or the statute of limitations.

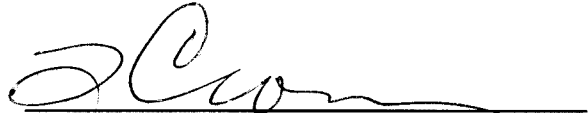
19 13. The parties understand and agree that facsimile or electronic copies of this
20 Stipulated Surrender of License, including facsimile or electronic signatures thereto, shall have
21 the same force and effect as the originals.

22 **ACCEPTANCE**

23 I have carefully read the above Stipulated Surrender of License, and have discussed it with
24 my counsel. I enter into it freely and voluntarily and with full knowledge of its force and effect
25 do hereby surrender my Physician and Surgeon's Certificate Number G54386 to the Medical
26 Board of California, for its formal acceptance. By signing this stipulation to surrender my
27 license, I recognize that upon its formal acceptance by the Board, I will lose all rights and
28 privileges to practice as a physician and surgeon in the State of California and I also will cause to

1 be delivered to the Board any license and wallet certificate in my possession before the effective
2 date of the decision.


3 DATED: 7/18/15


4 **LAWRENCE ROBERT CRONIN, M.D.**
5 *Respondent*

6 **APPROVAL**

7 I have fully discussed with Respondent Lawrence Robert Cronin, M.D. the terms and
8 conditions and other matters contained in the above Stipulated Surrender of License and approve
9 its form and content.

10 DATED: 7/22/2015


11
12 **GREGORY ABRAMS**
13 *Abrams Health Law*
14 *Attorneys for Respondent*

15 **ENDORSEMENT**

16 The foregoing Stipulated Surrender of License is hereby respectfully submitted for
17 consideration by the Medical Board of California.

18 DATED: 7/30/2015

19 **KAMALA D. HARRIS**
20 *Attorney General of the State of California*


21 **JANE ZACK SIMON**
22 *Supervising Deputy Attorney General*

23 *Attorneys for Complainant*

EXHIBIT A

Accusation, Case No. 800-2015-011000

1 KAMALA D. HARRIS
Attorney General of California
2 JANE ZACK SIMON
Supervising Deputy Attorney General
3 State Bar No. 116564
4 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5544
5 Facsimile: (415) 703-5480
E-mail: Janezack.simon@doj.ca.gov

6 *Attorneys for Complainant*

7
8 **BEFORE THE**
9 **MEDICAL BOARD OF CALIFORNIA**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the First Amended Accusation
12 Against:

13 **LAWRENCE ROBERT CRONIN, M.D.**
14 7333 E. Tanque Verde Road
Tucson, AZ 85715

15 Physician's and Surgeon's Certificate No.
16 G54386

17 Respondent.

Case No. 800-2015-011000

FIRST AMENDED ACCUSATION

18 The Complainant alleges:

19 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical
20 Board of California, Department of Consumer Affairs, and brings this First Amended Accusation
21 solely in her official capacity.

22 2. On March 11, 1985, Physician's and Surgeon's Certificate No. G54386 was issued
23 by the Medical Board of California to Lawrence Robert Cronin, M.D. (Respondent.) The
24 certificate is renewed and current with an expiration date of July 31, 2016.

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FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO July 7 20 15
BY [Signature] ANALYST

1 patient-physician relationship. Under the terms of the Interim Agreement, Respondent was
2 prohibited from engaging in the practice of medicine until he applied to the Arizona Medical
3 Board and received permission to do so. A copy of the Interim Consent Agreement for Practice
4 Restriction issued by the Arizona Medical Board is attached as Exhibit A.

5 On June 4, 2015, the Arizona Medical Board issued an Order for Surrender of License and
6 Consent to the Same (Order for Surrender.) The Order for Surrender includes factual findings
7 that Respondent provided psychiatric treatment to a patient from 2008-2014. He engaged in a
8 sexual relationship with his patient from September 2013 until September 2014. A medical
9 consultant who reviewed the patient's chart determined that Respondent departed from the
10 standard of care with regard to prescription of hypnotic agents to the patient, and failed to
11 appropriately document an assessment for substance abuse or dependence, allegations which were
12 denied by Respondent. In January 2015, Respondent completed a comprehensive psychosexual
13 evaluation. At the conclusion of the evaluation, Respondent was deemed unsafe to practice, and
14 it was recommended that he undergo a 90-day intensive residential treatment program to address
15 professional sexual boundary violations and maladaptive personality traits identified during the
16 course of the evaluation as well as adhere to any discharge recommendations made by the
17 treatment facility. Respondent presented for inpatient treatment on January 23, 2015. He was
18 administratively discharged on April 7, 2015 due in part to violation of program guidelines. As a
19 result the facility determined that Respondent reached the maximum treatment benefit for the
20 program. The facility's discharge recommendation was that Respondent remained unsafe to
21 practice absent additional treatment, and that he not return to practice absent at least a year of
22 physician supervised treatment and re-evaluation after a sustained period of sobriety from
23 compulsive behaviors or boundary violations. A copy of the Order for Surrender of License and
24 Consent to the Same issued by the Arizona Medical Board is attached as Exhibit B.

25 5. Respondent's conduct and the actions of the Arizona Medical Board as set forth in
26 paragraph 4, above, constitutes cause for discipline pursuant to sections 2305 and/or 141 of the
27 Code.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Physician's and Surgeon's Certificate Number G54386 issued to respondent Lawrence Robert Cronin, M.D.;
2. Revoking, suspending or denying approval of Respondent's authority to supervise physician assistants;
3. Ordering Respondent, if placed on probation, to pay the costs of probation monitoring; and
4. Taking such other and further action as the Board deems necessary and proper.

DATED: July 7, 2015


KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California

Complainant

EXHIBIT A

BEFORE THE ARIZONA MEDICAL BOARD

In the Matter of
Lawrence Cronin, M.D.
Holder of License No. 18696
For the Practice of Allopathic Medicine
In the State of Arizona.

Case No. MD-14-1469A

INTERIM CONSENT AGREEMENT
FOR PRACTICE RESTRICTION

INTERIM CONSENT AGREEMENT

Lawrence Cronin, M.D. ("Respondent") elects to permanently waive any right to a hearing and appeal with respect to this Interim Consent Agreement for Practice Restriction and consents to the entry of this Order by the Arizona Medical Board ("Board").

INTERIM FINDINGS OF FACT

1. The Board is the duly constituted authority for the regulation and control of the practice of allopathic medicine in the State of Arizona.

2. Respondent is the holder of License No. 18696 for the practice of allopathic medicine in the State of Arizona.

3. The Board initiated case number MD-14-1469A after receiving a report that Respondent had been involved in an inappropriate sexual relationship with a patient.

4. According to the report, Respondent is alleged to have engaged in a sexual relationship with a female patient that was initiated during the patient-physician relationship.

5. The aforementioned information was presented to the investigative staff, the medical consultant and the lead Board member. All reviewed the information and concur that the interim consent agreement to restrict Respondent's practice is appropriate.

1 6. The investigation into MD14-1469A is pending and will return to the Board
2 promptly upon completion for review and action.

3 INTERIM CONCLUSIONS OF LAW

4 1. The Board possesses jurisdiction over the subject matter hereof and over
5 Respondent.

6 2. Pursuant to A.R.S. § 32-1405(C)(25) the Executive Director has authority to
7 enter into a consent agreement when there is evidence of danger to the public health and
8 safety.

9 3. Pursuant to A.A.C. R4-16-504, the Executive Director may enter into an
10 interim consent agreement when there is evidence that a restriction is needed to mitigate
11 imminent danger to the public's health and safety. Investigative staff, the Board's medical
12 consultant and the lead Board member have reviewed the case and concur that an interim
13 consent agreement is appropriate.

14 INTERIM ORDER

15 IT IS HEREBY ORDERED THAT:

16 1. Respondent is prohibited from engaging in the practice of medicine in the
17 State of Arizona as set forth in A.R.S. § 32-1401(22) until he applies to the Board and
18 receives permission to do so.

19 2. The Board retains jurisdiction and may initiate new action based upon any
20 violation of this Interim Consent Agreement, including, but not limited to, summarily
21 suspending Respondent's license.

22 3. Because this is an Interim Consent Agreement and not a final decision by
23 the Board regarding the pending investigation, it is subject to further consideration by the
24 Board. Once the investigation is complete, it will be promptly provided to the Board for its
25 review and appropriate action.

1 officer of this State from instituting civil or criminal proceedings with respect to the conduct
2 that is the subject of this Interim Consent Agreement. Respondent further does not
3 relinquish his rights to an administrative hearing, rehearing, review, reconsideration,
4 judicial review or any other administrative and/or judicial action, concerning the matters
5 related to a final disposition of this matter, unless he affirmatively does so as part of the
6 final resolution of this matter.

7 5. Respondent acknowledges and agrees that upon signing this Interim
8 Consent Agreement and returning it to the Board's Executive Director, Respondent may
9 not revoke his acceptance of this Interim Consent Agreement or make any modifications to
10 it. Any modification of this original document is ineffective and void unless mutually
11 approved by the parties in writing.

12 6. Respondent understands that this Interim Consent Agreement shall not
13 become effective unless and until it is signed by the Board's Executive Director.

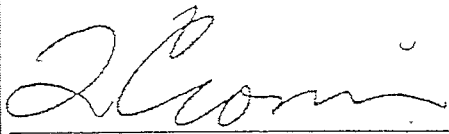
14 7. Respondent understands and agrees that if the Board's Executive Director
15 does not adopt this Interim Consent Agreement, he will not assert in any future
16 proceedings that the Board's consideration of this Interim Consent Agreement constitutes
17 bias, prejudice, prejudgment, or other similar defense.

18 8. Respondent understands that this Interim Consent Agreement is a public
19 record that may be publicly disseminated as a formal action of the Board, and that it shall
20 be reported as required by law to the National Practitioner Data Bank.

21 9. Respondent understands that this Interim Consent Agreement does not
22 alleviate his responsibility to comply with the applicable license-renewal statutes and rules.
23 If this Interim Consent Agreement remains in effect at the time Respondent's allopathic
24
25

1 medical license comes up for renewal, he must renew his license if Respondent wishes to
2 retain his license. If Respondent elects not to renew his license as prescribed by statute
3 and rule, Respondent's license will not expire but rather, by operation of law (A.R.S. § 32-
4 3202), become suspended until the Board takes final action in this matter. Once the
5 Board takes final action, in order for Respondent to be licensed in the future, he must
6 submit a new application for licensure and meet all of the requirements set forth in the
7 statutes and rules at that time.

8 10. Respondent understands that any violation of this Interim Consent
9 Agreement constitutes unprofessional conduct under A.R.S. § 32-1401(27)(r) ("[V]iolating a
10 formal order, probation, consent agreement or stipulation issued or entered into by the
11 board or its executive director under this chapter").
12

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14 
15 Lawrence Cronin, M.D.

DATED: 12/22/14

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18
19 DATED this 22nd day of December, 2014.

20 ARIZONA MEDICAL BOARD
21 By Patricia McSorley
22 Patricia McSorley
23 Interim Acting Executive Director

24
25 EXECUTED COPY of the foregoing e-mailed
this 22nd day of December, 2014 to:

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Lawrence Cronin, M.D. 01/15/2014
Address of Record

ORIGINAL of the foregoing filed
this 22nd day of December, 2014 with:

Arizona Medical Board
9545 E. Doubletree Ranch Road
Scottsdale, AZ 85258

Mary Baker
Arizona Medical Board Staff

EXHIBIT B

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BEFORE THE ARIZONA MEDICAL BOARD

In the Matter of
LAWRENCE CRONIN, M.D.
Holder of License No. 18696
For the Practice of Medicine
In the State of Arizona.

Case No. MD-14-1469A

**ORDER FOR SURRENDER
OF LICENSE AND CONSENT
TO THE SAME**

Lawrence Cronin, M.D. ("Respondent"), elects to permanently waive any right to a hearing and appeal with respect to this Order for Surrender of License; admits the jurisdiction of the Arizona Medical Board ("Board"); and consents to the entry of this Order by the Board.

FINDINGS OF FACT

1. The Board is the duly constituted authority for the regulation and control of the practice of allopathic medicine in the State of Arizona.
2. Respondent is the holder of license number 18696 for the practice of allopathic medicine in the State of Arizona.
3. The Board initiated case number MD-14-1469A after receiving a complaint regarding Respondent's care and treatment of a female patient ("RH") alleging that Respondent engaged in a sexual relationship with RH while Respondent was her treating psychiatrist/therapist. The complaint also alleged that Respondent overmedicated RH with hypnotic agents.
4. Respondent began to treat RH on November 17, 2008 in an outpatient clinic setting. Respondent thereafter provided outpatient psychiatric care to RH until April 29, 2014. . Respondent admitted during the course of the investigation that he and RH had a sexual relationship that commenced in September of 2013 and lasted until September of 2014.

1 5. The matter was reviewed by a Medical Consultant who identified deviations
2 from the standard of care with regard to Respondent's prescription of hypnotic agents to
3 RH. The MC also found that Respondent failed to appropriately document an assessment
4 for substance abuse or dependence for RH. Respondent denies that he breached the
5 standard of care with regard to prescribing medications to RH and affirmatively asserts
6 that his documentation was adequate

7 6. Based on a review of the available evidence, and in consultation with the
8 Board's medical consultant, who agreed that an evaluation was necessary, the Executive
9 Director issued a Confidential Interim Order for a Psychosexual Evaluation pursuant to
10 A.R.S. § 32-1451(C) and A.A.C. R4-16-501 on December 22, 2014. The Interim Order
11 required Respondent to both obtain an appropriate evaluation as well as complete any
12 treatment recommendations made by the evaluating facility. Additionally on that same
13 date, Respondent entered into a non-confidential Interim Order for Practice Restriction that
14 prohibited Respondent from practicing medicine in the State of Arizona until he applied to
15 the Board and received permission to do so.

16 7. On January 6 through 8, 2015, Respondent successfully completed a
17 comprehensive psychosexual evaluation at a Board approved facility. At the conclusion of
18 the evaluation, Respondent was deemed unsafe to practice to a reasonable degree of
19 medical probability. It was recommended that prior to resuming the active practice of
20 medicine, Respondent undergo a 90-day intensive, residential treatment program to
21 address professional sexual boundary violations and maladaptive personality traits
22 identified during the course of the evaluation as well as adhere to any discharge
23 recommendations made by the treatment facility.

24 8. Respondent presented for inpatient treatment on January 23, 2015. He was
25 administratively discharged on April 7, 2015 due in part to violations of program guidelines.

1 As a result, the facility determined that Respondent reached the maximum treatment
2 benefit for the program. The facility's discharge recommendation was that Respondent
3 remained unsafe to practice absent additional treatment, including that Respondent not
4 return to the practice of medicine absent at least a year of treatment supervised by a
5 physician approved by the Board and until he obtains a re-evaluation after a sustained
6 period of sobriety from compulsive behaviors or boundary violations. As of the date of this
7 consent order, Respondent asserts that he is following all of the recommendations of the
8 treatment facility for ongoing supervised treatment.

9 9. Respondent admits to the acts described above and that they constitute
10 unprofessional conduct.

11 CONCLUSIONS OF LAW

12 1. The Board possesses jurisdiction over the subject matter hereof and over
13 Respondent.

14 2. The conduct and circumstances described above constitute unprofessional
15 conduct pursuant to A.R.S. § 32-1401(27)(q) ("[a]ny conduct or practice that is or might be
16 harmful or dangerous to the health of the patient or the public.").

17 3. The conduct and circumstances described above constitute unprofessional
18 conduct pursuant to A.R.S. § 32-1401(27)(r) ("[v]iolating a formal order, probation, consent
19 agreement or stipulation issued or entered into by the Board or its Executive Director
20 under this chapter.").

21 4. The conduct and circumstances described above constitute unprofessional
22 conduct pursuant to A.R.S. § 32-1401(27)(z) ("[e]ngaging in sexual conduct with a current
23 patient or with a former patient within six months after the last medical consultation unless
24 the patient was the licensee's spouse at the time of the contact or, immediately preceding
25 the physician-patient relationship, was in a dating or engagement relationship with the

1 licensee. For the purposes of this subdivision, "sexual conduct" includes: (i) Engaging in or
2 soliciting sexual relationships, whether consensual or nonconsensual. (ii) Making sexual
3 advances, requesting sexual favors or engaging in any other verbal conduct or physical
4 contact of a sexual nature. (iii) Intentionally viewing a completely or partially disrobed
5 patient in the course of treatment if the viewing is not related to patient diagnosis or
6 treatment under current practice standards.").

7 5. The Board possesses statutory authority to enter into a consent agreement
8 with a physician and accept the surrender of an active license from a physician who
9 admits to being unable to safely engage in the practice of medicine and having committed
10 an act of unprofessional conduct. A.R.S. § 32-1451(T)(1) and (2).

11 **ORDER**

12 IT IS HEREBY ORDERED THAT Respondent immediately surrender License
13 Number 18696, issued to Lawrence Cronin, M.D., for the practice of allopathic medicine in
14 the State of Arizona, and return his certificate of licensure to the Board.

15 DATED and effective this 4th day of June, 2015.

16 ARIZONA MEDICAL BOARD

17
18 By: Patricia E. McSorley
19 Patricia E. McSorley
20 Executive Director

21 **CONSENT TO ENTRY OF ORDER**

22 1. Respondent has read and understands this Consent Agreement and the
23 stipulated Findings of Fact, Conclusions of Law and Order ("Order"). Respondent
24 acknowledges he has the right to consult with legal counsel regarding this matter.
25

1 2. Respondent acknowledges and agrees that this Order is entered into freely
2 and voluntarily and that no promise was made or coercion used to induce such entry.

3 3. By consenting to this Order, Respondent voluntarily relinquishes any rights
4 to a hearing or judicial review in state or federal court on the matters alleged, or to
5 challenge this Order in its entirety as issued by the Board, and waives any other cause of
6 action related thereto or arising from said Order.

7 4. The Order is not effective until approved by the Board and signed by its
8 Executive Director.

9 5. All admissions made by Respondent are solely for final disposition of this
10 matter and any subsequent related administrative proceedings or civil litigation involving
11 the Board and Respondent. Therefore, said admissions by Respondent are not intended
12 or made for any other use, such as in the context of another state or federal government
13 regulatory agency proceeding, civil or criminal court proceeding, in the State of Arizona or
14 any other state or federal court.

15 6. Upon signing this agreement, and returning this document (or a copy
16 thereof) to the Board's Executive Director, Respondent may not revoke the consent to the
17 entry of the Order. Respondent may not make any modifications to the document. Any
18 modifications to this original document are ineffective and void unless mutually approved
19 by the parties.

20 7. This Order is a public record that will be publicly disseminated as a formal
21 disciplinary action of the Board and will be reported to the National Practitioner's Data
22 Bank and on the Board's web site as a disciplinary action.

23 8. If any part of the Order is later declared void or otherwise unenforceable, the
24 remainder of the Order in its entirety shall remain in force and effect.

25

1 9. If the Board does not adopt this Order, Respondent will not assert as a
2 defense that the Board's consideration of the Order constitutes bias, prejudice,
3 prejudgment or other similar defense.

4 10. ***Respondent has read and understands the terms of this agreement.***

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7 LAWRENCE CRONIN, M.D.

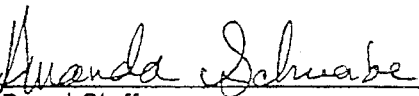
Dated: 5/29/15

8
9 EXECUTED COPY of the foregoing mailed by
US Mail this 4th day of June, 2015 to:

10 Peter Akmajian
11 Udall Law Firm
12 4801 East Broadway
13 Suite 400
14 Tucson, AZ 85711-3609
15 Attorney for Respondent

16 ORIGINAL of the foregoing filed this
17 4th day of June, 2015 with:

18 The Arizona Medical Board
19 9545 East Doubletree Ranch Road
20 Scottsdale, AZ 85258

21 
22 Board Staff

23
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25