September 17, 2009

Deputy Commissioner, F.D.A.
Joshua M. Sharfstein, M.D.
10903 New Hampshire Avenue
Building 1, Room 2224
Silver Springs, MD. 20993-0002

Re: Investigation of Lupron & Removal from Market

Dear Deputy Commissioner Sharfstein:

Regrettably I've written many prior letters, to the FDA and many others, regarding Lupron (please see my website, under 'Documents / Letters'), and quite frankly I am weary of writing letters about Lupron … but I don't know what else to do. And so I'm writing to you in the hopes that you will recognize the need for an investigation to be undertaken and for Lupron to be removed from the market.

For more than a decade I have been contacted by Lupron victims looking for medical care, legal assistance, wanting their former life back, and asking 'why doesn't the FDA do something?' – but there has been no where substantive to send them. Below please find 5 recent emails to my website mailbox, reflecting the harm that men, women, and children have experienced post-Lupron:

(#1): "My Dad was given Lupron for early onset of prostate cancer. He drove to the Doctor's office to get the Lupron shot & never drove again. He went into Dementia immediately after the shot & progressively got worse. He passed away about 3 years after getting the Lupron shot. He did not even have late stage prostate cancer. We know that Dad lost his life as a result of Lupron. We do not want anyone else to go through what my dad & my family went through as a result of Lupron. If our experience could help this cause, please advise."

(#2): "Hello, I'm not sure if you can help me. I've been looking at your website for the past few days, educating myself on the effects and harm lupron has on people.... my Dr. would not perform another surgery unless I got a lupron shot to see if it helped my pain, so I got a lupron shot, just once, about a year ago, I have no idea what dose. Since then, I've experienced negative side effects including menopausal symptoms such as hot flashes, night sweats, weight gain, loss of menstrual cycle, and most disturbing, decline in cognitive function. My memory loss is what scares me the most. I've always had an excellent memory, and now I cannot remember what happened in T.V. shows as I'm watching them. I have lost countless important items, and repeat myself incessantly. I was told by the OB that prescribed the shot that the side effects would go away in 3 - 4 months, then when they didn't go away he told me they could last 6 months, then when they still didn't go away he told me that

sometimes they can last for a year or so. Although I knew of the menopausal symptoms, I never knew about any of the cognitive side effects. I consider myself a relatively intelligent person and always do my homework when dealing with anything unfamiliar to me. Apparently I didn't research enough. I am very scared now, as my memory and other brain functions seem to continue to decline and the other "side effects" aren't improving either. My question to you is, do you know if there is anyone that can help me? is there anyway to reverse what has happened? I just feel kind of lost. Is there anyone you could recommend to me? or do you have any advice or anything that might help?

(#3): Dear Ms. Millican, I've visited your website in desperation and felt at times I wasn't going to make it. In February 2009, I was given a 3-4 months injection (course) of Lupron by my urologist. He told me the drug is safe and effective, and little or no side effects – maybe a little sweating. At age 58 my life has been destroyed and never the same. … A few months prior to Lupron, I had a complete physical work-up and was found to be in excellent health with abundance of energy! … Now, I'm lucky if I can walk to the toilet without falling. Without any prior warning, I also went into a diabetic coma … Each day is another challenge with life or deadly event!"

(#4): "Lynne, I don't know where else to turn. I have been suffering from passing out, heart palpitations, tremors (head and hand), joint pain, back surgery secondary to stenosis and degenerative disc disease, short term memory issues … I had taken Lupron for close to 5 years off and on for a total of 11 IVF cycles. Where do I go from here? No one can diagnose my symptoms. I have been in and out of the hospital and have had the so called "million dollar" work up but no one can come up with a diagnosis. Any direction would be greatly appreciated."

(#5) "I found your web site about Lupron while searching for some hopeful answers to help a 12 year old who was treated with Lupron for 3 years and now has debilitating consequences from the medication. I would really like to talk with you if possible. Maybe you can point me in the direction I need to go? If you think you could help or would like some info for your web site, please call me collect at …" In speaking with this woman, her grandchild has "lost all feeling in her legs, is in extreme pain, now has osteopenia and cannot stand, and has deterioration of the femur bone".

Recently I received the autopsy report of a 27 year old woman (mother to a 7 year old) who was given one shot of Lupron for 'diagnostic purposes for suspected endometriosis' (which she, in fact, did not have). The otherwise healthy woman died in her sleep 3 weeks later, dead from "undetermined cause" - presumed to be a lethal arrhythmia from Lupron, which would not show on autopsy. This woman's death does not appear in the FDA AERS reports for the involved time frame.

The now-defunct 'National Lupron Victims Network' (see my website, 'NLVN') had collected 10,000 + questionnaires from Lupron victims before it disappeared in 2000. Before it disappeared, one of the women who created the Network indicated that Lupron's manufacturer had offered to invest in the Network. It appears that a substantial investment may have been made.

The statistical logs from www.LupronVictimsHub.com record daily search terms. There are hundreds of variables, and while this is obviously anecdotal, these searches speak volumes to me, and so will provide a small sampling:

"*Does Lupron cause MS", "IVF Lupron leiomyosarcoma", "Lupron and dementia", "Lupron side effects central nervous system", "Lupron and ECG changes", "Lupron heart failure", "does Lupron cause seizures", "Lupron and memory loss", "Lupron and neurological side effects", "Lupron lupus", "eye damage after Lupron", "does Lupron cause deafness", "death from Lupron", "Lupron and aphasia", "Lupron stroke", "leuprolide cerebral infarction", "autoimmune disease Lupron", "Lupron thyroid malfunction", "Lupron and gastroparesis", "Lupron bone pain", "sterility after Lupron", "Lupron paresthesias", "Lupron thrombocytopenia", "Lupron sudden death", "side effects of Lupron and brain atrophy", "Lupron and brain damage", "Lupron and neurologic weakness", "Lupron psychosis", "conceived while on Lupron depot", "Lupron and hydrocephalus", "is Lupron associated with breast cancer", "Lupron liver damage", "Lupron myocardial infarction", "pulmonary hypertension and Lupron", "permanent Lupron insomnia", "Lupron and leukemia", "Lupron bone marrow depression", "what are specific birth defects caused by Lupron depot", "Lupron birth defects", "Lupron and Williams Syndrome"* [rare neurodevelopmental disorder]", and *"Lupron side effects that are permanent".*

There needs to be attention to these people and their questions.

I am aware of an investigation into Lupron that the FDA started at the behest of the NLVN in the 1990's that was "closed" shortly after it was opened. Subsequently, the FDA did a review in 1999, finding "high prevalence rates" of serious side effects yet concluded to take no action. In 2001, my 'USA[ttorney] Draft Document' (see my website, @ 'Documents') was provided by the Boston's US Attorney's Office to the 'FDA's Office of Criminal Investigation' and apparently went nowhere. The FDA did look at some Lupron issues in 2001 (prompted by my letters and legal brief: see my website, "FDA's 8-21-01 Response", under 'Documents/Letters'), but minimization of Lupron's effects continued. And in 2003, I testified in Congress on the risks of Lupron (please see my testimony at my website, @ 'Documents') and requested Congress undertake an investigation into Lupron (and 12 Lupron victims asked to have their names and stories included in my testimony), but no investigation took place. Currently, there is a Petition to Congress requesting an investigation into Lupron's side effects and this petition as of today has 323 signers (see my website's homepage for link to petition to read stories).

Shame on all those before you at the FDA who failed to take action on this iatrogenic, public health nightmare. And shame on those FDA Pediatric Advisory Committee members (debating leuprolide's administration to precocious puberty children and healthy control children) who were unaware (and in denial) that leuprolide is classified, according to the NIH and OSHA, as a "hazardous drug". (see my website, @ 'Risks – Children/PP')

In light of the 2008 large prostate cancer studies evidencing increased risks and mortality among men administered Lupron, it is now clear that "watchful waiting" is more efficacious than Lupron in the population of men with localized prostate cancer. The billions of dollars which Medicare has spent on Lupron for prostate cancer (4) has apparently paid for *increased mortality* in a substantial portion of the prostate cancer population. No large, long-term studies have been done tracking Lupron's effects on women or children to allow conclusions about these categories of recipients.

Please bear in mind that physicians have a substantial financial incentive to prescribe this drug (2), and that TAP has now been labeled a criminal enterprise by Federal Law enforcement. I hope that you will take measures to fully investigate Lupron, including the validity of the data submitted to the FDA by TAP to obtain approvals. (3) At the time the data was submitted, FDA's Acting Group Leader of Oncology Drugs, commenting on Lupron's NDA for palliative treatment for advanced prostate cancer, observed that "review of the case report forms often shows the reported results are incorrect or not reliable" and recommended that Lupron was unapprovable. (4) Since that 1984 conclusion, it has been learned that TAP's payments to physicians were sufficiently comprehensive to warrant sanctions of $875 million. Given this history, validity of the data and payment to clinical investigators should be a concern of any Lupron investigation.

I'm forwarding a copy of my MedWatch form, and have also enclosed my letter to Commissioner Hamburg. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Lynne Millican

(1): "Medicare has paid more than $4 billion for Lupron in the last decade." Bruce Jaspen, Andrew Zajac and Laurie Cohen, 'The Lupron loophole: Cancer drug strikes it rich', Chicago Tribune, April 29, 2001. Total allowable charges by Medicare for medical castration peaked in 2003 at $1.23 billion. Cancer, 2008:112:2195-201.

(2): "Pietraszek is the first high-ranking current or former TAP official to comment publicly about the company's sale strategy. ... Pietraszek was named president of TAP in 1986, an assignment he likened to taking the helm of the Titanic. The company lost $25 million that year and Lupron, then the venture's only product, was a close-to-impossible sell. ... Pietraszek had a brainstorm, born of his service in Japan as an executive for

Abbott. In Japan, he recalled, drugs were sold out of doctors' offices. ... TAP sold Lupron to doctors at steeply discounted prices, guaranteeing them fat profits on the prescriptions. ... The TAP president outfitted his sales force with laptop computers to help illustrate Lupron's profit making potential. ... The calculation was dubbed “return to practice” because “profit” was deemed too crass, Pietraszek said. ... As Lupron sales soared, some doctors reaped as much as $400,000 a year on the drug, Pietraszek said. ... The move made the drug, Lupron, a blockbuster seller”. Bruce Jaspen, Andrew Zajac and Laurie Cohen, 'The Lupron loophole: Cancer drug strikes it rich', Chicago Tribune, April 29, 2001.

(3): Please see 'Was Lupron's Initial [Male & Female] Approval Based Upon Safety and Efficacy' in my 2001 'USA[ttorney] Draft Document' at www.LupronVictimsHub.com, under 'History' and/or 'Documents'.

(4): FDA's Acting Group Leader of Oncology Drugs, Review, NDA 19-010, John R. Johnson M.D., July 6, 1984, p.4