

**IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
WILLIAM C. BRADFORD, M.D.,)
LICENSE NO. MD 11776,)
)
Defendant.)

FILED

JUN 10 2019

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 19-01-5694

VERIFIED COMPLAINT FOR PROFESSIONAL MISCONDUCT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“OSBMLS”) alleges and states as follows for its Complaint against William Conrad Bradford, M.D. (“Defendant”):

I. JURISDICTION

1. The OSBMLS Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma. 59 O.S. 2011, § 480, *et seq.* and Okla. Admin. Code 435:5-1-1 *et seq.*
2. Defendant holds Oklahoma medical license no. 11776.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. This action arises out of OIG Investigator Scott Jones report to OBMLS Investigator Robbin Roberts and DEA Agent Mary Surovec on January 20, 2019, that Defendant admitted that he ordered Tramadol under his own DEA number for personal use and had it mailed to the VA hospital where he was employed.
4. DEA Agent Surovec located two (2) invoices that confirmed Defendant ordered Diazepam 10 mg, #100 and Tramadol HCL 50 mg, #500.

III. INTERVIEW OF DEFENDANT

5. On January 24, 2019, Investigator Roberts and DEA Agent Surovec interviewed Defendant at the OSBMLS office.

6. Defendant was a radiologist and worked at the Oklahoma City VA hospital.
7. Defendant stated that a few years ago, he was prescribed Tramadol for restless leg syndrome. Defendant stated that it worked well, and when he ran out and his doctor had retired, he ordered it for himself in November, 2017 with no issues.
8. Defendant stated that he ordered it again in November, 2018, but this time, when the invoice came through the mailroom, it was reported through their chain of command.
9. Scott Jones, OIG/VA was called in to interview Defendant, who admitted he ordered it for himself.
10. Defendant claimed he took 1-2 tabs per night and never during the day. Defendant denies having any addiction.
11. Defendant stated that he submitted to a urine analysis at work on Friday, January 18, 2019, and was placed on leave pending the results. Defendant knew it would be a positive for Tramadol and he didn't have a recent valid prescription.
12. Defendant stated he immediately obtained a valid prescription for Tramadol from a physician who didn't know anything about the pending investigation.
13. Defendant also admitted he did not have a record for himself and did not keep dispensing records for DEA.
14. When asked about the Diazepam 10 mg, #100, ordered on the same invoice with the Tramadol order in November 2017, Defendant stated that he did not remember ordering it, but stated, "if you say I did, then I guess I did".
15. Defendant voluntarily surrendered his DEA permit.
16. Investigator Roberts requested Defendant obtain a substance abuse assessment. Defendant completed an assessment on February 8, 2019, at Professional Renewal Center in Lawrence, Kansas.
17. Defendant was allowed to use sick leave at the VA until his retirement paperwork was completed.
18. Defendant's retirement date became effective on March 8, 2019.
19. On April 22, 2019, Defendant entered into an Agreement Not to Practice with OSBMLS.

IV. VIOLATIONS

20. Based on the foregoing, Defendant, William Conrad Bradford, M.D., is guilty of unprofessional conduct as follows:
 - a. Failure to keep complete and accurate records of purchase and disposal of controlled drugs, in violation of 59 O.S. § 509(10);

- b. Purchasing or prescribing any regulated substance in Schedule I through V, as defined by the Uniform Controlled Dangerous Substances Act, for the physician's personal use, in violation of OAC 435:10-7-4(5);
- c. Ordering any drug legally classified as a controlled substance for himself, in violation of OAC 435:10-7-4(26).

V. CONCLUSION

Given the foregoing, the undersigned respectfully requests the Board conduct a hearing, and, upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation and any other appropriate action with respect to Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



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FOR: OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

VERIFICATION

I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding William Conrad Bradford, M.D., Defendant; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 6-6-19

Oklahoma

County, State of Execution