BEFORE THE BOARD OF MEDICAL PRACTICE
IN AND FOR THE STATE OF DELAWARE

IN RE:	)	
	)	**Complaint No. 10-11[illegible]-09**
EARL B. BRADLEY, M.D.	)	
License No. C1-0004285	)	
MD 2482		

PUBLIC ORDER

WHEREAS, the Board of Medical Practice ("the Board") has reviewed the attached Consent Agreement and by a vote of 8 members, with one member abstaining, approves the Consent Agreement and enters it now as an Order of the Board. The Certificate to Practice Medicine (C1-0004285) issued to Earl B. Bradley, M.D., is hereby permanently revoked and the additional terms and conditions specified in the Consent Agreement are entered as the Order of the Board.

Pursuant to 24 *Del. C.* §1735 a copy of this Order shall be served personally or by certified mail, return receipt requested, upon Earl B. Bradley, M.D.

SO ORDERED this 19th day of February, 2010.

BOARD OF MEDICAL PRACTICE

Raymond L. Moore, Sr., Public Member, President

Oluseyi Senu-Oke, M.D., Vice-President

Stephen Cooper, M.D. Secretary

Gregory Adams, M.D.

John Banks, Public Member

Vance Daniels, Public Member

Sharon Jones, Public Member

Vincent Lobo, D.O.

George Brown, Public Member
(Abstaining)[1]

Date mailed:_____

[1] Mr. Brown attended the meeting for purposes of establishing the quorum but did not vote because he was the assigned contact member for the complaint.

BEFORE THE DELAWARE BOARD OF MEDICAL PRACTICE

IN RE: EARL B. BRADLEY	)	
	)	**Case No.: 10-111-09**
LICENSE NUMBERS: C1-0004285	)	
MD 2482	)	

CONSENT AGREEMENT

A written Complaint has been filed with the Board of Medical Practice ("Board") alleging that Earl B. Bradley ("Respondent"), a licensed medical physician and prescriber of controlled substances in the State of Delaware, has engaged in conduct which constitutes grounds for discipline under 24 *Del.C.* C. 17). Respondent denies that he has engaged in any such conduct.

Respondent, the State by the undersigned Deputy Attorney General, and the Board hereby enter into this Consent Agreement without the necessity of a formal disciplinary hearing and administrative prosecution before the Board pursuant to 24 *Del.C.* Ch. 17 and 29 *Del.C.* Ch. 101.

IT IS UNDERSTOOD AND AGREED THAT:

1. Respondent is a licensed medical doctor and prescriber of controlled substances in the State of Delaware. His medical license, number C1-004285, was first issued on April 12, 1994, and is active. His controlled substance license, number MD 2482, was first issued on April 12, 1994, and is active.

2. Respondent has been charged with rape in the second degree, unlawful sexual contact in the first degree, endangering the welfare of a child, rape in the first degree, and sexual exploitation of a child.

3. Respondent, the State, and the Board agree that Respondent's licenses will be revoked as of the date he signs this Consent Agreement.

4. In order to provide for his patients' medical care, Respondent voluntarily agrees to the transfer of all patient records to any physician licensed in the State of Delaware and /or any medical institution designated by the Director of the Division of Professional Regulation and the Executive Director of the Board of Medical Practice.

5. Respondent agrees to waive any and all interest he may have in the patient records and further agrees to hold harmless any physician and/or medical institution designated to receive the records from any and all claims made by patients in regard to their records.

6. In order to protect the public, Respondent agrees to the confiscation, destruction, and/or disposal of all medications, drugs and other materials such a hypodermic needles used in the diagnosis, mitigation and treatment or prevention of injury, illness, and disease in his office by the Executive Secretary of the Board of Pharmacy.

7. Respondent agrees to waive any and all interest he may have in all medications, drugs and other materials in his office used in the diagnosis, mitigation and treatment or prevention of injury, illness, and disease that are confiscated, destroyed, and/or disposed of under this Consent Agreement.

8. Respondent acknowledges that he is waiving his right under 24 *Del.C.* Ch. 17 and 29 *Del.C.* Ch. 101 to a disciplinary hearing before the Board prior to the revocation of his licenses.

9. Respondent acknowledges and agrees that he has carefully read and understands this Consent Agreement and that he is entering into this Consent Agreement freely, knowingly, voluntarily, and after having the opportunity to receive the advice of counsel.

10. Respondent further agrees and acknowledges that in the event the Board determines not to accept this Consent Agreement, neither he nor anyone on his behalf will in any way or in

any forum challenge the ability of the Board or any of its members to conduct an evidentiary hearing relating to the allegations in the subject Complaint on the basis of the Board's prior consideration of this proposed Consent Agreement.

11. Respondent, the State, and the Board agree that Respondent does not admit the conduct alleged in the State's complaint and that no inference of guilt is evidenced or implied by the terms of this Agreement.

12. Respondent understands that this Consent Agreement is a public document and that the Board will report this Consent Agreement to the licensing authority of any other state in which he is licensed to practice and to national databases which collect information on such disciplinary actions.

13. This Consent Agreement shall be effective immediately upon execution by Respondent.

Earl B. Bradley, MD
Respondent

Gayle L. MacAfee, M.S.
Executive Director
Delaware Board of Medical Practice

Witnessed by:

Signature of Witness

Dated: 2/18/10

Please print Witness' name

Barbara J. Gadbois, Esquire
Deputy Attorney General
Department of Justice

Dated: 2/18/10

Dated: 2/18/10