

Steven L. Bradbard, Ph.D.
8804 Saddle Lane
Potomac, Maryland 20854

Lawrence Donner, Ph.D., Chair
Board of Examiners of Psychologists
Department of Health and Mental Hygiene
4201 Patterson Avenue
Baltimore, Maryland 21215

Re: License Number 2562

Dear Dr. Donner and Members of the Board:

Please be advised that I have decided to surrender my license to practice psychology in Maryland effective August 1, 1991.

My decision to surrender my license and discontinue practice as a licensed psychologist has been prompted by an investigation by the Board of Examiners of Psychologists (the "Board"). I acknowledge that the Board has charged me with violations of the Maryland Psychologists Act (the "Act"). Specifically, on June 19, 1991, the Board charged me with violations of Md. Health Occ. Code Ann. §§18-313 (1) and (11) (1991 Repl. Vol.). A copy of the Board's charging document is attached and incorporated into this letter. I have decided to surrender my license and discontinue practice as a licensed psychologist in order to avoid a formal disciplinary proceeding before the Board.

In executing this agreement to surrender my license as a psychologist to the Board, I understand that I may not practice psychology in Maryland, as such practice is defined at Md. Health Occ. Code Ann. §18-101(e) (1991 Repl. Vol.).

I further recognize and agree that, in surrendering my license, my status is the same as that of an individual whose license has been revoked following a hearing before the Board. In other words, I agree that if, in the future, I determine that I would seek once again to practice as a licensed psychologist in Maryland, I will approach the Board in the same posture as an individual whose license has been revoked for reasons as set forth above and in the charging document of June 19, 1991.

I realize that if I wish to resume practice as a psychologist, I must petition the Board for reinstatement of my revoked license. At that time, the Board will review my case and determine my fitness to have my license reinstated. In other words, the Board has no obligation to reinstate my license. In the event the Board is willing to reinstate my license, before my license is reinstated I must pass the licensure examinations

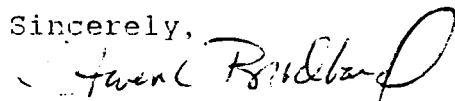
required by the Board at that time.

In executing this agreement, I further agree that I will not apply for reinstatement of my license to practice psychology before August 1, 1996.

In addition, I agree that this letter, the attachments, and the Board's disposition will be considered public information and may be released or published by the Board to the same extent as a final order which results from a formal disciplinary action. I understand that this letter, the attachments, and the Board's disposition are disclosable under §10-617(h)(2)(vi) of the Maryland Public Information Act, Md. State Government Code Ann. §10-611 et seq. I also understand that this letter of surrender may affect my licensure status in other states.

Finally, I wish to make clear that I have consulted with an attorney before signing this letter SURRENDERING my license to practice psychology in Maryland. I understand the nature of the charges against me and this letter of surrender. I make this decision to surrender my license to practice psychology in Maryland knowingly and voluntarily.

Sincerely,



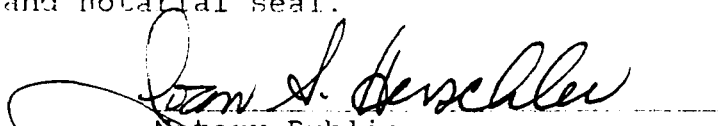
Steven L. Bradbard, Ph.D.

VERIFICATION

State of Maryland
City/County of Montgomery

I HEREBY CERTIFY that on this 6th day of August, 1991, before me, a Notary Public of the State and City/County aforesaid, personally appeared Steven L. Bradbard, Ph.D. and declared and affirmed under the penalties of perjury that signing the foregoing Letter of Surrender was his voluntary act and deed.


AS WITNESSETH my hand and notarial seal.


Notary Public
JOAN S. HERSCHLER

My commission expires 3/1/93

ACCEPTANCE

On behalf of the Board of Examiners of Psychologists, on this 9th day of August, 1991, I accept Steven L. Bradbard, Ph.D.'s surrender of his license to practice psychology in Maryland.


Lawrence Donner, Ph.D.
Chair, Board of Examiners
of Psychologists

Enclosures

cc: Susan R. Steinberg, Esquire, Counsel to the Board
E. James Kearney, Staff Attorney.
Administrative Prosecutor
Carl E. Ameringer, Deputy Counsel



DEPARTMENT OF HEALTH AND MENTAL HYGIENE
BOARD OF EXAMINERS OF PSYCHOLOGISTS

4201 PATTERSON AVENUE • BALTIMORE, MARYLAND 21215-2299 • Area Code 301-764-4787
June 19, 1991 TTY For Deaf: Balto. 383-7555
D.C. Metro Area 565-0451

CERTIFIED MAIL P-529-346-059
RETURN RECEIPT REQUESTED

Steven L. Bradbard, Ph.D.
8804 Saddle Lane
Potomac, Maryland 20854

Re: Charges Under the Maryland
Psychologists Act

Dear Dr. Bradbard:

By the enclosed Charges Under the Maryland Psychologists Act, the Board of Examiners of Psychologists (the "Board") charges you in accordance with the Maryland Psychologists Act (the "Act"), Title 18 of the Health Occupations Article, Annotated Code of Maryland. If the Board finds you have committed the acts as charged, the Board may reprimand you or suspend or revoke your license and may place you on probation.

Under §18-315 of the Act, you are entitled to an evidentiary hearing on the charges. The Board has scheduled the hearing on July 30, 1991 at 10:00 a.m., in Room 301, 4201 Patterson Avenue, Baltimore, Maryland 21215. The administrative prosecutor who will present the case against you is F. James Kearney, Staff Attorney, Office of the Attorney General. Please be advised that if you do not appear at the hearing, the Board has the authority to hear and determine the matter despite your absence.

In addition to the hearing, the Board has scheduled a prehearing conference on July 9, 1991 at 10:00 a.m. in Room 301, 4201 Patterson Avenue, Baltimore, Maryland 21215. A representative from the Board will conduct the prehearing conference. The purpose of the prehearing conference is twofold: to prepare for the hearing and to determine whether there is any basis for resolution of this case. Accordingly, please be prepared to discuss witness lists and general hearing procedures at the prehearing conference.

Steven L. Bradbard, Ph.D.
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The administrative prosecutor may be contacted regarding settlement of this matter before the hearing. If a proposed settlement is reached with the administrative prosecutor, the proposed settlement may then be presented to the representative from the Board at a prehearing conference. If the Board representative believes that the agreement reached between you and the prosecutor will be approved by the Board, the representative may choose to present the agreement to the Board. However, the Board may accept or reject the settlement. If the Board rejects the settlement, the parties will then proceed to a hearing.

In the event of a hearing, the proceedings before the Board will be conducted in accordance with the Administrative Procedure Act, §10-201 et seq. of the State Government Article, Annotated Code of Maryland and regulations adopted by the Board under COMAR 10.36.03. The Administrative Procedure Act gives you the right to be represented by counsel, call witnesses, present evidence, cross-examine any witness, and present argument and summation.

Any decision made by the Board could affect your license to practice psychology in the State of Maryland and you are strongly urged to retain and be represented by an attorney at the prehearing conference and at all other stages before the Board. To appear on your behalf at the prehearing conference or hearing before the Board, your attorney must be admitted to the Bar in Maryland or specially admitted under Rule 14 of the Maryland Rules Governing Admission to the Bar.

If you or your attorney have any questions about the charges, please contact Mr. Kearney at the Office of the Attorney General, 300 West Preston Street, Suite 302, Baltimore, Maryland 21201, (301) 225-1846.

Sincerely,



Lawrence Donner, Ph.D.
Chair

FJK
Encl.

cc: Susan R. Steinberg, Esquire, Counsel to the Board
F. James Kearney, Staff Attorney,
Administrative Prosecutor
Carl F. Ameringer, Deputy Counsel

Psychologists ("North Carolina Board") at the time he applied for licensure to practice psychology in the State of Maryland.

3. On December 29, 1989 the North Carolina Board gave Respondent notice of allegations underlying an administrative proceeding before the North Carolina Board, In the Matter of Stephen L. Bradbard.

4. Beginning on June 1, 1990, Respondent was licensed to practice psychology in Maryland.

5. On October 22, 1990, the North Carolina Board revoked Respondent's license to practice psychology in North Carolina.

6. The North Carolina Board made, in pertinent part, the following findings of fact:

"... 8. In July, 1987, [REDACTED] became a client of Respondent's. She remained his client until at least December, 1987, or January, 1988.

9. [REDACTED] initially came to see Respondent for marriage counseling. Between September, 1987, and December, 1987, [REDACTED]'s husband sometimes accompanied her for sessions with Respondent. [REDACTED] and her husband separated in May, 1988.

10. After seeing [REDACTED] for some months, Respondent, when she was attending sessions alone, began to sit close to her and to give her closely-held, prolonged hugs. Later, he began giving her kisses as well as hugs. ...

12. A sexual relationship developed between Respondent and [REDACTED]. Respondent and [REDACTED] first engaged in sexual intercourse in Respondent's office during a session in November or December, 1987. After that time, Respondent and [REDACTED] continued having sexual intercourse during therapy sessions. Respondent and [REDACTED] engaged in sexual intercourse both in Respondent's office and, after her separation from her husband, at her home. [REDACTED] continued to see Respondent for therapy for at least two sessions after the sexual relationship began. On at least one occasion, Respondent bound, gagged, and blindfolded [REDACTED]

while engaging in sexual acts with her. On at least one occasion, Respondent bound [REDACTED] and ran a knife or other sharp object over her body. Respondent asked [REDACTED] to let him cut her. She said 'no'. This sexual relationship continued until December, 1988. . . .

15. On more than one occasion during the time of his sexual relationship with [REDACTED], Respondent and [REDACTED] went on social outings together, including meals in Winston-Salem, trips to Greensboro for supper, a trip to Charlotte while [REDACTED] took an interior decorating examination, and a trip to the mountains.

16. In her relationship with Respondent, [REDACTED] felt as though she was not in control and was unable to leave the relationship.

2nd Client->

17. In March, 1985, [REDACTED] became a client of Respondent. She remained his client until September, 1989.

18. During therapy sessions with [REDACTED], Respondent shared intimate details of his life and marriage with her. He also made personal and intimate remarks to her.

19. After [REDACTED] had attended approximately three (3) therapy sessions with Respondent, a sexual relationship developed between Respondent and [REDACTED]. During therapy sessions at Salem Psychiatric Associates, and later at a separate office set up by Respondent, Respondent engaged in vaginal, oral, and anal intercourse with [REDACTED]. On more than one occasion, Respondent bound [REDACTED] and ran a letter opener or other sharp object over her body. On at least one occasion while doing this, he left scratch marks on her skin. This sexual relationship continued until September, 1989. During the entire time that Respondent and [REDACTED] were engaged in sexual relationship, [REDACTED] was also seeing Respondent for therapy.

20. During therapy sessions, Respondent told [REDACTED] that the sexual conduct in which they were engaged was therapeutic and good for her.

21. On one occasion while [REDACTED] was admitted as a patient at Charter Hospital in Winston-Salem, North Carolina, and at a time when Respondent was her treating psychologist, Respondent went to the patient area, got [REDACTED], took her to another part of the hospital, and engaged in oral intercourse with her. . . .

23. In addition to the sexual activity in the office during therapy sessions and at Charter Hospital, Respondent took [REDACTED] to a park in Winston-Salem and to a building in Old Salem, where they engaged in sexual acts. . . . On at least one occasion, Respondent took photographs of [REDACTED] while she was nude. On one occasion, Respondent took [REDACTED] to his home in Winston-Salem, where he tied her to a bed and took a video of her.

24. During the period of the relationship between [REDACTED] and Respondent, [REDACTED] trusted Respondent and depended upon him to know what was best for her. She felt helpless in the relationship.

25. [REDACTED] is under continuing psychological and psychiatric care and has been hospitalized at Charter Hospital twice in 1990."

Final Decision. In the Matter of Stephen L. Bradbard, pp. 2 - 4.

7. The North Carolina Board made, in pertinent part, the following conclusions of law:

" . . . 2. Respondent's sexual relationship with [REDACTED] constituted a violation of the Ethical Principles of Psychologists, Principle 6a.

3. Respondent's relationship with [REDACTED] constituted a dual relationship that was exploitive of the psychologist/client relationship, and was a violation of the Ethical Principles of Psychologists, Principle 7d.

4. Respondent's sexual relationship with [REDACTED] constituted a violation of the Ethical Principles of Psychologists, Principle 6a.

5. Respondent's relationship with [REDACTED] constituted a dual relationship that was exploitive of the psychologist/client relationship, and was a violation of the Ethical Principles of Psychologists, Principle 7d.

6. Respondent's violations of the Ethical Principles of Psychologists, Principles 6a and 7d, constitute grounds for suspension, revocation, or other disciplinary action, pursuant to . . . [North Carolina law].

7. The seriousness of the violations of the Ethical Principles of Psychologists committed by Respondent make any discipline less than revocation inappropriate."

Final Decision, In the Matter of Stephen L. Bradbard, pp. 4 - 5.

8. Respondent was disciplined by the North Carolina Board for acts that would be grounds for disciplinary action under Maryland statutes, and thereby violated §18-313(11) of the Maryland Psychologists Act.

9. On the application for licensure received by the Maryland Board on January 25, 1990, Respondent listed licensure only in the State of New York and failed to list licensure in North Carolina.

10. Respondent's failure to inform the Maryland Board of his licensure in North Carolina constitutes a violation of §18-313(1) of the Act, to wit, the applicant fraudulently or deceptively obtains or attempts to obtain a license.

11. Question number 16 of Respondent's application for licensure received by the Maryland Board on January 25, 1990 asks "[h]ave you ever been investigated or charged with unethical practices or unprofessional conduct, or are you presently being investigated or under charges?". Respondent answered "no".

12. Respondent's failure to inform the Maryland Board of the investigations and charges underlying In the Matter of Stephen Bradbard constitutes a violation of §18-313(1) of the Act, to wit, the applicant fraudulently or deceptively obtains or attempts to obtain a license.

NOTICE OF POSSIBLE SANCTIONS

If, after a hearing, the Board finds cause to take action under §18-313 of the Act, the Board may impose disciplinary

sanctions against Respondent's license, including revocation, suspension, or reprimand, and may place the Respondent on probation.


NOTICE OF HEARING AND PREHEARING CONFERENCE

A hearing in this matter has been set for July 30, 1991 at 10:00 a.m. in Room 301, 4201 Patterson Avenue, Baltimore, Maryland 21215. The Board will conduct the hearing in accordance with the Administrative Procedure Act, §10-201 et seq. of the State Government Article, Annotated Code of Maryland, §18-315 of the Act, and the Regulations adopted by the Board under COMAR 10.36.03.

In addition, a prehearing conference in this matter has been set for July 9, 1991 at 10:00 a.m. in Room 301, 4201 Fatterson Avenue, Baltimore, Maryland 21215. The nature and purpose of the prehearing conference is described in the attached letter to Respondent.

June 19, 1991

 Date



 Lawrence Donner, Ph.D.
 Chair

IN THE MATTER OF	*	BEFORE THE MARYLAND
STEVEN L. BRADBARD, Ph.D.	*	BOARD OF EXAMINERS
	*	OF PSYCHOLOGISTS

* * * * *

SUMMONS AND NOTICE OF HEARING

YOU ARE HEREBY SUMMONED to appear at a hearing before the Board of Examiners of Psychologists (the "Board") to determine whether you have violated the Maryland Psychologists Act as described in the attached document "Charges Under the Maryland Psychologists Act" and what sanctions, if any, are appropriate. The hearing is scheduled for July 30, 1991 at 10:00 a.m. in Room 301, 4201 Patterson Avenue, Baltimore, Maryland 21215.

This hearing is held under the authority of §18-315 of the Health Occupations Article, §10-205 et seq. of the State Government Article, and COMAR 10.36.03.

If you do not appear as required by this summons, the Board may hear and determine this matter in your absence, as provided under §18-315 of the Health Occupations Article.

June 19, 1991
Date

Lawrence Donner Ph.D.
Lawrence Donner, Ph.D.
Chair