

1 **BEFORE THE ARIZONA STATE BOARD OF PHARMACY**

2 In the Matter of:

Investigation Case Number 04-0004-PHR

3 BRADLEY S. KOONSE, RPh. )  
4 Holder of License No. 11273 )  
5 For the Practice of Pharmacy )  
6 In the State of Arizona, )  
Respondent )

**CONSENT AGREEMENT AND ORDER  
FOR REVOCATION**

7 **RECITALS**

8 In the interest of a prompt and judicious settlement of this case, consistent with the public  
9 interest, statutory requirements and the responsibilities of the Arizona State Board of Pharmacy  
10 ("Board") and under A.R.S. §§ 32-1901 *et. seq.* and 41-1092.07(F)(5) , BRADLEY S. KOONSE  
11 ("Respondent"), holder of pharmacist license number 11273 to practice pharmacy in the State of  
12 Arizona, and the Board enter into the following Recitals, Findings of Fact, Conclusions of Law and  
13 Order ("Consent Agreement") as a final disposition of this matter.

14 1. Respondent has read and understands this Consent Agreement and has had the  
15 opportunity to discuss this Consent Agreement with an attorney, or has waived the opportunity  
16 to discuss this Consent Agreement with an attorney.

17 2. Respondent understands that he has a right to a public administrative hearing concerning  
18 the above-captioned matter, at which hearing he could present evidence and cross-examine witnesses.  
19 By entering into this Consent Agreement, Respondent freely and voluntarily relinquishes all right  
20 to such an administrative hearing, as well as rights of rehearing, review, reconsideration, appeal,  
21 judicial review or any other administrative and/or judicial action, concerning the matters set forth  
22 herein. Respondent affirmatively agrees that this Consent Agreement shall be irrevocable.

23 3. Respondent understands that this Consent Agreement or any part of the agreement may  
24 be considered in any future disciplinary action against him.

25 4. Respondent understands this Consent Agreement deals with Board Investigation  
26 Case No. 04-0004-PHR involving allegations of unprofessional conduct against Respondent. The

1 investigation into these allegations against Respondent shall be concluded upon the Board's  
2 adoption of this Consent Agreement.

3 5. Respondent understands that this Consent Agreement does not constitute a dismissal  
4 or resolution of any other matters currently pending before the Board, if any, and does not constitute  
5 any waiver, express or implied, of the Board's statutory authority or jurisdiction regarding any other  
6 pending or future investigation, action or proceeding. Respondent also understands that acceptance of  
7 this Consent Agreement does not preclude any other agency, subdivision, or officer of this State from  
8 instituting other civil or criminal proceedings with respect to the conduct that is the subject of this  
9 Consent Agreement.

10 6. Respondent acknowledges and agrees that upon signing this Consent Agreement and  
11 returning this document to the Board's Executive Director, Respondent may not revoke his acceptance  
12 of the Consent Agreement or make any modifications to the document regardless of whether the  
13 Consent Agreement has been signed by the Executive Director. Any modification to this original  
14 document is ineffective and void unless mutually agreed by the parties in writing.

15 7. Respondent understands that the Consent Agreement shall not become effective unless  
16 and until adopted by the Board and signed by its Executive Director.

17 8. If a court of competent jurisdiction rules that any part of this Consent Agreement is void  
18 or otherwise unenforceable, the remainder of the Consent Agreement shall remain in full  
19 force and effect.

20 9. Respondent understands and agrees that if the Board does not adopt this Consent  
21 Agreement, he will not assert as a defense that the Board's consideration of this Consent  
22 Agreement constitutes bias, prejudice, prejudgement or other similar defenses.

23 10. Respondent understands that this Consent Agreement is a public record that may be  
24 publicly disseminated as a formal action of the Board and may be reported as required by law to  
25 the National Practitioner Data Bank and the Healthcare Integrity and Protection Data Bank.

26 11. Respondent understands that any violation of this Consent Agreement constitutes

1 unprofessional conduct under A.R.S. § 32-1927 (A) (17) (the licensee violated a formal order, terms of  
2 probation, a consent agreement or a stipulation issued or entered into by the board or its Executive  
3 Director pursuant to this chapter) and may result in disciplinary action under A.R.S. § 32-1927.

4 **REVIEWED AND ACCEPTED BY:**

5 Bradley S. Koonse  
6 **BRADLEY S. KOONSE**

02/20/04  
DATE



7 [Signature]  
8 **Notary Public**

9 **FINDINGS OF FACT**

10 By stipulation of the parties, this Consent Agreement is entered into for final disposition of the  
11 matters described herein. Respondent admits to the following Findings of Fact:

12 12. The Board is the duly constituted authority for the regulation and control of the practice of  
13 pharmacy in the State of Arizona.

14 13. The Board possesses jurisdiction over the subject matter and over Respondent as a licensee  
15 of the Board under A.R.S. § 32-1901, *et seq.*

16 14. Respondent is the holder of a license 11273 which permits him to engage in the practice of  
17 pharmacy in the State of Arizona.

18 15. Respondent was employed as a pharmacist between the dates of January 1, 2001 and  
19 December 17, 2003 at Casa Grande Regional Medical Center hospital pharmacy, 1800 E. Florence  
20 Blvd., Casa Grande, Arizona. On December 17, 2003, Gale Carey, RPh, Director of Pharmacy at the  
21 hospital contacted the Board's Deputy Director to report the following:

22 On December 16, 2003, Respondent was removed from the Casa Grande Regional Medical  
23 Center hospital pharmacy by the Director of Nursing who believed that Respondent required acute  
24 medical care because Respondent was "blacking out". After the Respondent was treated in the hospital  
25 emergency room, Respondent was terminated from employment at the hospital for violation of the  
26 hospital substance abuse policy.

1 16. On December 29, 2003, Respondent, during a voluntary meeting at the Board office,  
2 admitted to the Executive Director and the Deputy Director of the Board that he had been self-  
3 medicating by removing the overfill of Versed® multi-dose vials and injecting it into his system.  
4 Respondent admitted that he "blacked out" as a consequence of injecting himself with Versed ® on  
5 December 16, 2003 and that he was taken to the hospital emergency room for treatment

6 17. Versed® is a Class IV Controlled Substance as defined in A.R.S. § 36-2515 and 21  
7 C.F.R. § 1308.14 and requires a prescription from a licensed health care practitioner. Respondent has  
8 failed to provide the Board with a valid prescription for Versed®.

9 18. Respondent is addicted to Versed® and to support his addiction Respondent illegally  
10 obtained Versed® from Casa Grande Regional Medical Center hospital pharmacy as described in the  
11 Findings of Fact above, Paragraph 16.

12 19. On January 2, 2004, Respondent voluntarily entered into a contract with the Pharmacists  
13 Assisting Pharmacists of Arizona (PAPA), a substance abuse treatment program that was  
14 recommended by the Board staff and authorized under A.R.S. § 32-1932.01.

15 20. On January 14, 2004, Respondent voluntarily appeared at the Board office and informed  
16 Johnnie Teutschman, the office manager at the Board office, that he had shredded and incinerated his  
17 pharmacist license number 11273. Respondent also signed a document in which he agreed to  
18 voluntarily surrender his pharmacist license to the Board.

19 21. On January 16, 2004, Respondent asked PAPA staff to terminate his contract. A week later  
20 Respondent returned to the PAPA office and admitted that he had relapsed the previous weekend.  
21 Conversation with the PAPA program administrative co-ordinator ensued and Respondent decided to  
22 seek inpatient treatment at Valley Hope treatment center.

23 22. On January 19, 2004 Respondent's contract with PAPA was terminated. A new contract  
24 will be available to him upon completion of the inpatient treatment.

25 **CONCLUSIONS OF LAW**

26 23. The Board is the duly constituted authority for the regulation and control of the practice of

1 pharmacy in the state of Arizona, under A.R.S. § 32-1901, et seq.

2 24. The conduct and circumstances described in the Findings of Fact above constitute  
3 grounds for disciplinary action under A.R.S. § 32-1927 (A)(4), (5) & (10) and A.R.S. § 32-1927  
4 (B)(2) to wit:

5 **A.R.S. § 32-1927(A)** The license of any pharmacist, pharmacy intern or graduate intern may be  
6 revoked or suspended or a pharmacist or intern may be placed on probation by the board if:

7 (4) The licensee reports for duty under the influence of alcohol or other drugs.

8 (5) The licensee is addicted to the use of alcohol or other drugs to such a degree as to render  
9 the licensee unfit in the opinion of the board to practice the profession of pharmacy.

10 (10) The licensee is found by the board to be guilty of violating any Arizona or federal  
11 law, rule, or regulation relating to the manufacture and distribution of drugs, devices, or the  
12 practice of pharmacy.

13 **A.R.S. § 32-1927 (B)** The license of any pharmacist or pharmacy intern may be revoked  
14 or suspended or the pharmacist or pharmacy intern may be placed on probation or censured  
15 and a civil penalty of not more than one thousand dollars [(\$1000.00)] for each offense may  
16 be imposed by the board if the licensee:

17 (2) Is found by the board, or is convicted in a federal or state court, of having  
18 violated federal or state laws or administrative rules pertaining to marijuana, prescription-  
19 only drugs, narcotics, dangerous drugs or controlled substances.

### 20 ORDER

21 Based upon the above Findings of Fact and Conclusions of Law and under the authority  
22 granted to the Board under A.R.S. § 32-1928, 41-1092.07 (F)(5), and A.A.C. R4-23-104(G).

23 **IT IS HEREBY ORDERED** that:

24 25. Effective January 14, 2004, License No. 11273, which was issued to Respondent for the  
25 practice of pharmacy in the State of Arizona, is hereby **REVOKED**.  
26

1 DATED and EFFECTIVE this 17<sup>th</sup> day of March, 2004

2 ARIZONA STATE BOARD OF PHARMACY

3 

4 Hal Wand, RPh  
5 Executive Director  
6 Arizona State Board of Pharmacy

7  
8 ORIGINAL of the foregoing, fully executed,  
9 filed this 17<sup>th</sup> day of March 2004, with:

10 Arizona State Board of Pharmacy  
11 4425 W. Olive Avenue, #140  
12 Glendale, Arizona 85302

13 Fully Executed Copy of the foregoing sent  
14 via Certified US mail this 19<sup>th</sup> day of  
15 March, 2004 to:

16 BRADLEY S. KOONSE  
17 544 E. Palo Verde Street  
18 Casa Grande, AZ 85222-1623

19 Copy or the foregoing mailed  
20 this 19<sup>th</sup> day of March, 2004 to:

21 Roberto Pulver  
22 Assistant Attorney General  
23 1275 W. Washington, CIV/LES  
24 Phoenix, Arizona 85007  
25 Attorney for the State  
26

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bradley S. Koonse  
544 E. Palo Verde Street  
Casa Grande AZ 85222-1623

2. Article Number (Copy from service label)  
7000 1670 0006 4396 3884

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

- A. Received by (Please Print Clearly) B. Date of Delivery  
 ESTERILLO DR Koonse S/SH/4
- C. Signature  
 [Signature]
- D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:  Yes  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.
4. Restricted Delivery? (Extra Fee)  Yes

DOE 1/2  
→ 12/17/03

E.R.  
12/29

BRADLEY S. KOONSE  
11273

544 E. PALO VERDE ST.  
CASA GRANDE  
85222  
(520) 836-6949

1/21  
INPATIENT  
NEW  
CONTRACT

04-04  
VALLEY HOPE

1800 E.  
FRANCIS  
BLVD

VIOLATION  
OF SUBSTANCE

CG Red med ~~Choy~~ Choy

CIV

2/27/16

BRAD KOONSE

BLACKING OUT - TAKEN TO ER

SELF-MEDICATION  
w/ S.L. VERAP @

RANNEY SANMARTIN  
DOESON & CO

C.G. OVERFILE FROM  
ORIGINAL VIA

2wks - 3wks

COUNTS

MANDY  
(480) 367-6401

544 E.  
PALO VERDE  
ST. - CG  
85222-1623

GOOD SAM - N/A

AA SCREENS

---

DR. HAMMIST - MD.  
PSYCH IN C.O.C.

---

2pm

SARAH

XO

LIBERTY

3567

772-398-5800

X 38134

# P.A.P.A.

RECEIVED  
PHARMACISTS BOARD  
ASSISTING PHARMACISTS  
OF ARIZONA  
FEB 2 2004 12:49

1845 E. Southern Avenue • Tempe, AZ 85282-5831  
(480) 838-3668 Fax (480) 838-0881

February 2, 2004

Hal Wand, Executive Director  
Arizona State Board of Pharmacy  
4425 W. Olive Ave., Suite 140  
Glendale, AZ 85302-3844

Dear Hal,

This letter is to notify the Arizona State Board of Pharmacy that a participant in the PAPA program is in violation of his PAPA contract.

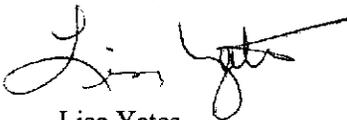
Bradley Koonse signed a new PAPA contract on January 2, 2004. His contract required him to complete intensive outpatient treatment at Valley Hope Treatment Center, attend three (3) self-help meetings per week, submit twenty-four (24) random urine screens per year and attend weekly peer group counseling sessions.

On January 16, 2004, Mr. Koonse came into the PAPA office requesting his PAPA contract to be terminated. He was advised at that time to put the request in writing. On January 19, 2004, Mr. Koonse came back into the PAPA office and admitted that he had relapsed the previous weekend. He decided he did not want out of the PAPA program but needed to go inpatient at Valley Hope Treatment Center. He was admitted into Valley Hope on January 21, 2004.

As of January 19, 2004, Mr. Koonse's PAPA contract has been terminated. A new contract will be available to him upon completion of his inpatient treatment.

If you should have any further questions, please feel free to contact me at the PAPA office.

Sincerely,



Lisa Yates  
PAPA Administrative Coordinator

Cc PAPA Steering Committee  
Dennis McAllister, President, ASBP  
Bradley Koonse

# P.A.P.A.

**PHARMACISTS  
ASSISTING  
PHARMACISTS  
OF ARIZONA**

1845 E. Southern Avenue • Tempe, AZ 85282-5831  
(480) 838-3668 Fax (480) 838-0881

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Arizona State Board of Pharmacy  
4425 W. Olive Ave., Suite 140  
Glendale, AZ 85302-3844

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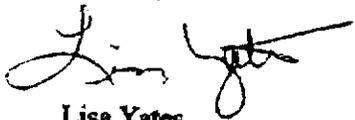
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Sincerely,



Lisa Yates  
PAPA Administrative Coordinator

Cc PAPA Steering Committee  
Dennis McAllister, President, ASBP  
Bradley Koonse



ARIZONA STATE BOARD OF PHARMACY

PO Box 6389, GLENDALE, ARIZONA 85312-6389  
4425 WEST OLIVE AVENUE, SUITE 140, GLENDALE, ARIZONA 85302-3844  
623-463-ASBP (2727) FAX 623-934-0583  
www.pharmacy.state.az.us

I, Bradley S. Koonse holder of pharmacist license  
number 11273 Issued by the Arizona State Board of Pharmacy, \*voluntarily  
surrenders the License and current certificate of renewal to the Arizona State Board of Pharmacy.

\*The actual documents named above are not available because I shredded and  
incinerated by me on the date of January 10, 2004.

I realize that during the time my license and renewal are voluntarily surrendered, I cannot  
accept employment, serve in the capacity of a licensed pharmacist nor enter the pharmacy  
compounding area of any pharmacy.

Bradley S. Koonse 01/14/04  
Signature (licensee) Date

Patricia K. Roy 1-14-04  
Signature (ASBP staff) Date  
Patricia K. Roy

Johnnie P. Teutschman 1/14/04  
Signature (ASBP staff) Date  
Johnnie P. Teutschman