

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

UNITED STATES OF AMERICA, }
 Plaintiff, }
 }
 vs. }
 }
ROBERT W. BRADFORD }
 Defendant. }

Case No. 08-CR-20168-01-KHV

STATEMENT OF ISSUES PERTINENT TO SENTENCING

Now Comes Defendant, Robert W. Bradford, by and through counsel, Michael L. Harris, and submits to the Court the following Statement of Issues pertinent to Sentencing. The Addendum to the Presentence Report explains how Defendant believes the United States Sentencing Commission Sentencing Guidelines apply to the facts of this case, and will not be reiterated here. Rather, this pleading will focus on Robert W. Bradford, and how his interest in medicine developed, and the current state of his health.

Robert Bradford's Professional Life:

At age 19 Robert Bradford joined the United States Air Force. His initial interest was law enforcement, he wanted to train as a military police officer. However, aptitude tests administered by the Air Force showed an affinity for science. Consequently, Bradford was trained in radar technology, specifically relating to the generation of radio frequency energy that is the basis for all radar technologies.

By the end of his military career in 1955, Robert Bradford had developed sufficient expertise in the generation of radio frequency energy, he was hired by General Electric

Corporation. General Electric at that time was a major defense contractor involved in, among many other things, the development and deployment of the Distant Early Warning System. The DEW System was a series of radar installations around the northern latitudes to initially detect aircraft approaching from the Soviet Union. Later, with the development of ballistic missiles, the radar technologies developed by General Electric played a key role in the national security of this country. By the time he left General Electric, Robert Bradford was the director of test facilities at the General Electric Microwave Research Laboratory in Palo Alto, California. He was one of the leading experts in Klystron Tubes, and their use in generating radio frequency energy. Klystron tubes are a specialized linear-beam vacuum tube used as amplifiers of microwave and radio frequencies.

Particle physicist's began using Klystron Tubes in particle accelerators, which study the subatomic world. Stanford University in 1962 established the SLAC Linear Accelerator Laboratory. Robert Bradford was hired by Stanford to work on the development of a linear accelerator at the Menlo Park, California campus. Ultimately, Stanford constructed over 200 of the Klystron tubes for use in the linear particle accelerator. The SLAC Linear Accelerator Laboratory became operational in about 1972.

Because Klystron tubes can be used to amplify both microwave and radio frequencies, medical applications were developed which used lower power amplification of microwave frequencies in radiation oncology. Use of these tubes in the treatment of cancer was the beginning of Robert Bradford's interest in medicine. Dr. John Richardson, now deceased, was a cancer treatment specialist in Oakland, California. Dr. Richardson was an early proponent of the use of laetrile in the treatment of cancer. During Bradford's time at Stanford, Stanford University did a study on the efficacy of laetrile. Bradford met with Dr. Richardson about his use

of laetrile, and ultimately was a technician for Dr. Richardson. This experience in approximately 1974 led to Robert Bradford's interest in medicine in general, and what is commonly referred to as alternative medicine in particular.

In the mid-1970's, Robert Bradford began studying blood, believing that subtle changes in the composition of the blood could be a predictor of disease. While studying in France, Bradford began studying photomicroscopy, that is, taking pictures through the lens of a microscope of blood on a prepared slide. At first, a simple Polaroid camera was mounted on the microscope, a picture was taken, and catalogued once developed. Upon returning to the United States, Bradford continued to experiment with microscopes, trying to develop a way to view specimens in a more natural state than on prepared slides.

These experiments led to the Bradford Projection Microscope which utilizes a projection magnification system. Projection magnification requires an intensely bright light source, and bright light is also hot light. A special optical cable was developed which absorbs the infra-red frequencies. This results in the brightness necessary, but the light is not hot, and consequently does not kill whatever is mounted on the slide. This microscope has been purchased by research hospitals such as the Georgetown University Research hospital, Vanderbilt University, and Tulane University. The microscope has also been purchased by salmon farmers, and textile manufacturers. No more than two microscopes were sold for the diagnosis and treatment of Lyme disease.

Robert Bradford's interest in Lyme disease began when he was infected in 2003. The usual antibiotic treatments did not work for him, so he began his own study of the disease, and the historical treatment of infections caused by spirochete bacteria. Through most of the first half of the twentieth century, the spirochete causing syphilis was treated with bismuth citrate.

Bradford developed his own bismuth compound. He tested various concentrations to determine the weakest concentration that would actually kill the spirochete causing Lyme. The objective was to find a therapeutic dose, that is one that would kill the target, but leave the host unharmed. Robert Bradford himself was the first Lyme patient given infusions of Bismacine for the treatment of Lyme disease.

Robert Bradford fully accepts responsibility for his actions in this case and the consequences of those actions. It is important for the Court to understand that he is not some quack snake-oil salesman. Robert Bradford believes that science can and does advance general welfare of all.

Current Health Condition of Robert Bradford:

As the Court knows, Robert Bradford was diagnosed with prostate cancer in 2008. The prostate was removed, but not before the cancer had metastasized. He currently has tumors in his lungs, and his pelvic floor. His blood is regularly tested for PSA levels, which indicate active prostate cancer cells if the PSA is above 5. From his surgery in 2009 until November, 2010, his PSA level remained below 5. In November, 2010 the level spiked to 10. By January, 2011, the PSA level had reached 22.5 In February, the PSA level increased again. This indicates that the prostate cancer is active again.

Chemotherapy is scheduled to begin in March, 2011, shortly after sentencing on March 1, 2011. This is expected to take at least three months at the Scrips Hospital in San Diego, California. As indicated, Bradford's prostate surgery was in 2009. In April, 2010, his treating physician, Robert Hathorne, advised defense counsel that only five percent of metastatic prostate cancer patients survive three years. This bleak prognosis was the primary motivation for both parties in reaching the plea agreement with the agreed upon disposition.

In conclusion, Defendant Robert W. Bradford respectfully requests that the Court accept the Plea Agreement, and impose the sentence agreed upon by the parties.

Respectfully submitted,

s/Michael L. Harris

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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2011, a copy of said motion was filed electronically with the clerk of the court and e-mailed to:

Scott Rask
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s/ Michael L. Harris

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