

Praxsyn Corporation
7904 E. Chaparral Rd., Ste. A110-210
Scottsdale, AZ 85250
NIA 18-043-S

FILED

APR 30 2021

NEVADA STATE BOARD
OF PHARMACY



MAILED
5/3/21

9171 9690 0935 0252 0549 64

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
 - 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.
- Article Addressed to:

Praxsyn Corporation
7904 E. Chaparral Rd., Ste. A110-210
Scottsdale, AZ 85250

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *[Signature]* ☒ Agent
☐ Addressee

B. Received by (Printed Name) *[Signature]* C. Date of Delivery *5-17*

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery

9171 9690 0935 0252 0549 64

Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

EXHIBIT 1

Scot Silber, RPh
3155 Hazy Hills Ave
Henderson, NV, 89052
NIA 18-043-S

9171 9690 0935 0252 0549 95

FILED

APR 30 2021

NEVADA STATE BOARD
OF PHARMACY



MAILED
5/3/21

SENDER: COMPLETE THIS SECTION

- 1. Complete items 1, 2, and 3.
 - 2. Print your name and address on the reverse so that we can return the card to you.
 - 3. Attach this card to the back of the mailpiece, or on the front if space permits.
- Article Addressed to:

Scot Silber, RPh
155 Hazy Hills Ave
Henderson, NV, 89052

COMPLETE THIS SECTION ON DELIVERY

A. Signature
x [Signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) *Nancy Silber* C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	

9171 9690 0935 0252 0549 95

Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt



NEVADA STATE BOARD OF PHARMACY

985 Damonte Ranch Pkwy Suite 206, Reno, Nevada 89521

(775) 850-1440 • 1-800-364-2081 • FAX (775) 850-1444

• Web Page: bop.nv.gov

December 14, 2021

Nevada Health Rx dba Prax-Rx, Praxyn Corporation
7904 E. Chaparral Road, Suite A110-210
Scottsdale, AZ 85250

Re: Nevada Health Rx dba Prax-Rx, Praxyn Corporation and Case No. 18-043-PH-S

Dear Nevada Health Rx dba Prax-Rx, Praxyn Corporation

The hearing for case number **18-043-PH-S** has been scheduled for Wednesday, January 12, 2022 9:00 AM PST or soon thereafter.¹ Pursuant to NRS 241.023(1)(c) you may appear live via Zoom remotely or at the following location:

Home2 Suites Las Vegas Strip South
7740 Las Vegas Blvd. South
Las Vegas, NV 89123

Via Videoconference at Zoom: <https://zoom.us/j/5886256671>

or

Via Teleconference at 1 (669) 900-6833
Meeting ID: 588 625 6671

Pursuant to NRS 241.033 and 241.034, please be advised that the hearing is a public meeting, and the Board may, without further notice, take administrative action against you if the Board determines that such administrative action is warranted after considering your character, alleged misconduct, professional competence, or physical or mental health. The Board at its discretion may go into closed session to consider your character, alleged misconduct, professional competence, or physical or mental health. You may attend any closed session, have an attorney or other representative of your choosing present during any closed session, and present written evidence, provide testimony, and present witnesses relating to your character, alleged misconduct, professional competence, or physical or mental health during any closed session.

If you have any questions, please feel free to contact the board staff.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Mangosing".

Kristopher Mangosing
Assistant Board Coordinator

EXHIBIT 2

9171 9690 0935 0265 1329 32

¹ Please note that the Board meeting will commence Wednesday; however, the meeting will continue, if necessary, on Thursday until the Board concludes its business. The full meeting agenda is available at www.notice.nv.gov and www.bop.nv.gov.

[FAQs >](#)[Track Another Package +](#)**Tracking Number:** 9171969009350265132932[Remove X](#)

Your item was delivered to an individual at the address at 12:33 pm on December 20, 2021 in SCOTTSDALE, AZ 85250.

Delivered, Left with Individual

December 20, 2021 at 12:33 pm
SCOTTSDALE, AZ 85250

[Feedback](#)[Get Updates v](#)[Text & Email Updates](#)[Tracking History](#)[Product Information](#)[See Less ^](#)

Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.



NEVADA STATE BOARD OF PHARMACY

985 Damonte Ranch Pkwy Suite 206, Reno, Nevada 89521

(775) 850-1440 • 1-800-364-2081 • FAX (775) 850-1444

• Web Page: bop.nv.gov

December 14, 2021

Nevada Health Rx dba Prax-Rx, Praxyn Corporation
61 Spectrum Blvd
Las Vegas, NV 89101

Re: Nevada Health Rx dba Prax-Rx, Praxyn Corporation and Case No. 18-043-PH-S

Dear Nevada Health Rx dba Prax-Rx, Praxyn Corporation

The hearing for case number **18-043-PH-S** has been scheduled for Wednesday, January 12, 2022 9:00 AM PST or soon thereafter.¹ Pursuant to NRS 241.023(1)(c) you may appear live via Zoom remotely or at the following location:

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Kristopher Mangosing
Assistant Board Coordinator

9171 9690 0935 0265 1329 49

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Track Another Package +

Tracking Number: 9171969009350265132949

Remove X

Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.

In Transit, Arriving Late

December 21, 2021

Feedback

Get Updates ✓

Text & Email Updates



Tracking History



Product Information



See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.



NEVADA STATE BOARD OF PHARMACY

985 Damonte Ranch Pkwy Suite 206. Reno, Nevada 89521

(775) 850-1440 • 1-800-364-2081 • FAX (775) 850-1444

• Web Page: bop.nv.gov

December 14, 2021

Scot Silber
3155 Hazy Hills Ave
Henderson, NV 89052

Re: Scot Silber and Case No. 18-043-RPH-S

Dear Scot Silber

The hearing for case number **18-043-RPH-S** has been scheduled for Wednesday, January 12, 2022 9:00 AM PST or soon thereafter.¹ Pursuant to NRS 241.023(1)(c) you may appear live via Zoom remotely or at the following location:

Home2 Suites Las Vegas Strip South
7740 Las Vegas Blvd. South
Las Vegas, NV 89123

Via Videoconference at Zoom: <https://zoom.us/j/5886256671>

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If you have any questions, please feel free to contact the board staff.

Sincerely,

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Kristopher Mangosing
Assistant Board Coordinator

9171 9690 0935 0265 1329 56

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[FAQs >](#)[Track Another Package +](#)**Tracking Number:** 9171969009350265132956[Remove X](#)

Your item was delivered to the front desk, reception area, or mail room at 3:31 pm on December 17, 2021 in HENDERSON, NV 89052.

Delivered, Front Desk/Reception/Mail Room

December 17, 2021 at 3:31 pm
HENDERSON, NV 89052

[Feedback](#)[Get Updates ∨](#)

[Text & Email Updates](#)

[Tracking History](#)

[Product Information](#)

[See Less ^](#)

Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.

Timesheet for Courtney K. Lee, Esq.

**Nevada State Board of Pharmacy v. Nevada Health Rx, Inc. dba Prax Rx, Silber –
Case No. 18-043**

DATE	TIME	DESCRIPTION
11/4/2020	1.25	Meet with investigator regarding case review/possible charges
1/20/2021	2.5	Review investigator's report and evidentiary documents
4/7/2021	4.0	Draft Notice of Intended Action and Accusation
5/13/2021	0.25	Telephone conference with Silber regarding whether he would retain counsel, and his request for continuance to September Board meeting
8/12/2021	0.25	Email to Silber regarding continuance to October Board meeting; receipt of Silber's email confirmation of receipt
1/11/2022	1.0	Review case file in preparation for hearing
1/12/2022	1.5	Hearing (estimated)
TOTAL	10.75	10.75 hours x \$56 rate per hour = \$602.00

Total attorney's fees and investigative costs:

\$ 602.00 (Courtney K. Lee's Timesheet)

\$1,610.00 (Dena McClish's, Investigator, Timesheet)

\$ 130.00 (Yenh Long's Timesheet)

\$ 38.77 (Shirley Hunting's, Board Coordinator, Timesheet)

\$2,380.77

Timesheet for Investigator Dena McClish

**Nevada State Board of Pharmacy v. Nevada Health Rx, Inc. dba Prax Rx, Silber –
Case No. 18-043**

DATE	TIME	DESCRIPTION
6/18/2018	0.75	Email referral from DEA
6/19/2018	0.5	Telephone conference with managing pharmacist
6/20/2018	2.75	Meeting with DEA
6/27/2018	0.25	Telephone conference with managing pharmacist
8/8/2018	4.75	Travel to pharmacy location; reviewed documents
8/9/2018	3.0	Drafted investigative report with attachments
8/16/2018	1.0	Revise report
8/30/2018	4.0	Contact prescribing physicians; review and revise report
9/14/2018	6.25	Draft letters to prescribing physicians requesting documents, telephone calls, visits
9/10/2018	3.75	Review statements, documents from physicians, add to report
9/11/2018	5.25	Organize exhibits to report, revise report
9/25/2018	2.75	Finalize investigative report
TOTAL	35.0	35 hours x \$46 rate per hour = \$1,610.00

**Timesheet for Yen Long, Deputy Executive Secretary –
Prax, CASE NO 18-043**

Date	Time
------	------

11/05/2020	1.00
------------	------

Reviewed draft Notice of Intended Action and Accusation.

01/21/2021	0.50
------------	------

Reviewed revised Notice of Intended Action and Accusation.

6/01/2021	0.50
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Reviewed discussed case with board staff.

TOTAL 2 hours x \$65.00/hour = \$130

Timesheet for Shirley Hunting –

Scot Silber – Prax RX- Case No. 18-043-S

Date	Hours	Activity
05/03/2021	1	Prepared Accusation for filing/mailling.

Total Hours

Rate 38.77

Total Costs 38.77

NEVADA STATE BOARD OF MEDICAL EXAMINERS

9600 Gateway Drive
Reno, NV 89521

Rachakonda D. Prabhu, M.D.
Board President

Edward O. Cousineau, J.D.
Executive Director



July 26, 2019

Re: Cantury Wellness Clinic



We have received your complaint; however, for the reason(s) indicated below, we either cannot investigate your complaint as stated, or we do not have jurisdiction to investigate:

- ☐ You have not identified a health care provider (a person).
- ☐ The person you identified is NOT a licensee of this Board.
- ☒ No jurisdiction. Your complaint has been forwarded to the listed agency, who we believe has jurisdiction. A copy HAS been retained by us.

NV State Board of Pharmacy
431 W. Plumb Ln.
Reno, NV 89509-3766

- ☐ No jurisdiction. NRS 630 (the Medical Practice Act) does not cover (provide us with jurisdiction over) the situation you describe, and we cannot identify any agency which might have jurisdiction.
- ☐ This case has already been investigated under case #.
- ☐ We are unable to read and understand your complaint. Please resubmit a copy stating specifically what your complaint is.
- ☐ Other:

If you have any questions about this determination, please write or call at the contact information provided below. In State Toll Free: (888) 890-8210 or Out of State (775) 688-2559.

Investigations Division, Intake, Nevada State Board of Medical Examiners.

Exhibit 1

Samantha M. Hendricks

From: shendricks@medboard.nv.gov
Sent: Tuesday, July 02, 2019 6:28 PM
To: Samantha M. Hendricks
Subject: Complaint

RECEIVED

JUL 02 2019

Data from form "Complaint Form" was received on 7/2/2019 6:28:13 PM. LISTED BY BOARD OF MEDICAL EXAMINERS

Complaint Form

Field	Value
Complainant_Name	Gail Lopez Gonzalez
Complainant_Gender	Female
Complainant_Phone	
Complainant_Address	Retail Rd
Complainant_City	Carson city
Complainant_State	Nv
Complainant_ZipCode	89706
Patient_Name	Numerous
Patient_Gender	Female
Patient_BirthDate	(
HCPProfessional1_Name	Cantury Wellness Clinic
HCPProfessional1_Address	521 Hammill Ln
HCPProfessional1_City	Reno
HCPProfessional1_State	Nv
HCPProfessional1_ZipCode	89511
HCPProfessional1_Phone	775-826-0707
HCPProfessional2_Name	
HCPProfessional2_Address	
HCPProfessional2_City	
HCPProfessional2_State	
HCPProfessional2_ZipCode	
HCPProfessional2_Phone	
HCPProfessional3_Name	
HCPProfessional3_Address	
HCPProfessional3_City	
HCPProfessional3_State	

no info listed

242

Field	Value
HCPProfessional3_ZipCode	
HCPProfessional3_Phone	
Occurrence_Date	Continual
Treatment_PhysicianOffice	true
PhysicianOffice_Name_Address	
Treatment_Hospital	false
Hospital_Name_Address	
Treatment_OtherFacility	false
OtherFacility_Name_Address	
SecondOpinion_Obtained	No
SecondOpinion_PhysicianName	
SecondOpinion_PhysicianAddress	
SecondOpinion_Diagnosis	
Complaint_Summary	<p>It has been brought to my attention that above named clinic is using expired medical supplies in their cancer patients. These people pay \$44,000 + "cash" for 3 weeks of treatment with expired supplies. Not to mention that there is an expiration date for a reason. They charge up to \$1,000 per treatment for a bit C infusion. These patients put their trust and lives in the clinics hands. Not to mention their homes and many other things. I have pictures of some of the expired supplies being used</p> <p>Blessings Gail.</p>
Attestation	true
Date_Submitted	07/02/19

Email "Complaint" originally sent to shendricks@medboard.nv.gov from shendricks@medboard.nv.gov on 7/2/2019 6:28:13 PM.

-----Original Message-----

From: Trent S. Hiett <thiETT@medboard.nv.gov>
Sent: Tuesday, August 20, 2019 9:16 AM
To: Joe Depczynski <joed@pharmacy.nv.gov>
Subject: Nevada Medical Board Century Wellness Clinic/Dr. Forsythe

Mr. Depczynski:

Attached is the complaint that was referred to the Pharmacy Board in the complaint "Gail" states the clinic is using expired medical supplies and she has pictures. I received the pictures from Gail last week and they are also attached for your review.

After reviewing this is there any concern here? Is he in violation of any pharmacy board regulations?

Thanks for reviewing this,

Respectfully,

Trent S Hiett
Investigator
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, NV 89521
775-324-9375
775-688-2553 Fax
Web: medboard.nv.gov

CONFIDENTIALITY STATEMENT: THIS E-MAIL AND ANY ATTACHMENTS ARE INTENDED SOLELY FOR THE NAMED RECIPIENT(S) AND MAY CONTAIN INFORMATION THAT IS (I) PROPRIETARY TO THE SENDER, AND/OR, (II) PRIVILEGED, CONFIDENTIAL, AND/OR OTHERWISE EXEMPT FROM DISCLOSURE UNDER APPLICABLE STATE AND FEDERAL LAW, INCLUDING, BUT NOT LIMITED TO, PRIVACY STANDARDS IMPOSED PURSUANT TO THE FEDERAL HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996 ("HIPAA"). IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY REPLY E-MAIL OR BY TELEPHONE AT (775) 324-9375, AND DESTROY THE ORIGINAL TRANSMISSION AND ITS ATTACHMENTS WITHOUT READING OR SAVING THEM TO DISK. THANK YOU.

CONFIDENTIAL HEALTH INFORMATION: PROTECTED HEALTH INFORMATION IS PERSONAL AND SENSITIVE INFORMATION RELATED TO A PERSON'S HEALTH CARE. IF PROTECTED HEALTH INFORMATION IS BEING E-MAILED OR FAXED TO YOU, IT IS BEING E-MAILED OR FAXED TO YOU AFTER APPROPRIATE AUTHORIZATION FROM THE PATIENT OR UNDER CIRCUMSTANCES THAT DO NOT REQUIRE PATIENT AUTHORIZATION. YOU AS THE RECIPIENT ARE OBLIGATED TO MAINTAIN IT IN A SAFE, SECURE AND CONFIDENTIAL MANNER. RE-DISCLOSURE WITHOUT ADDITIONAL PATIENT AUTHORIZATION OR AS PERMITTED BY LAW IS PROHIBITED. UNAUTHORIZED RE-DISCLOSURE OR FAILURE TO MAINTAIN CONFIDENTIALITY COULD SUBJECT YOU TO PENALTIES UNDER FEDERAL AND STATE LAW.



Sent from my iPhone

On Aug 15, 2019, at 10:29 AM, Trent S. Hiatt <thiatt@medboard.nv.gov> wrote:

Dear Ms. Lopez Gonzalez:

In your complaint you mentioned that you have pictures of some of the expired supplies being used. I was hoping that you could send me a copy of those pictures for our investigative file.

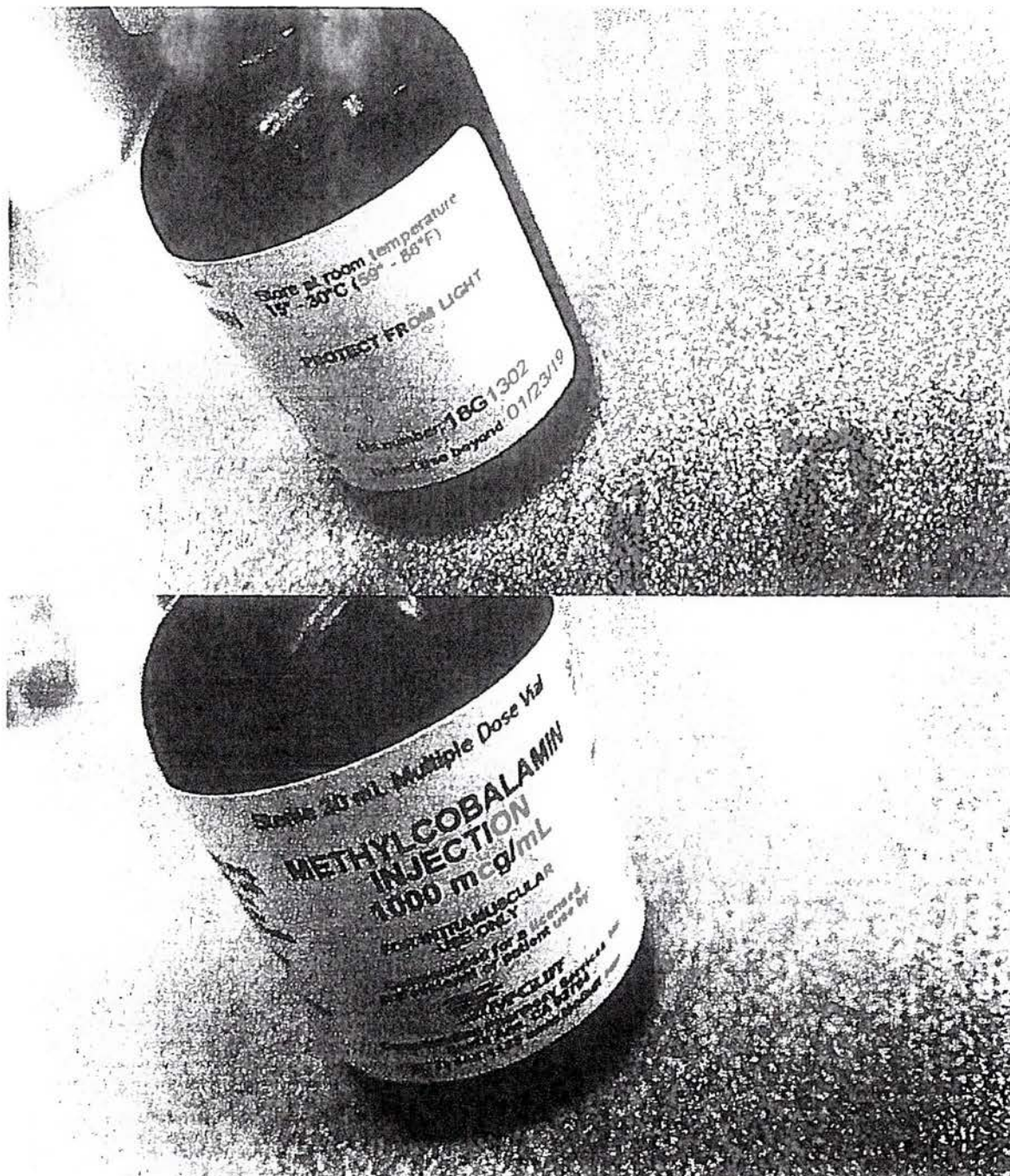
You can email them if you like.

Respectfully,

Trent S Hiatt
Investigator
Nevada State Board of Medical Examiners

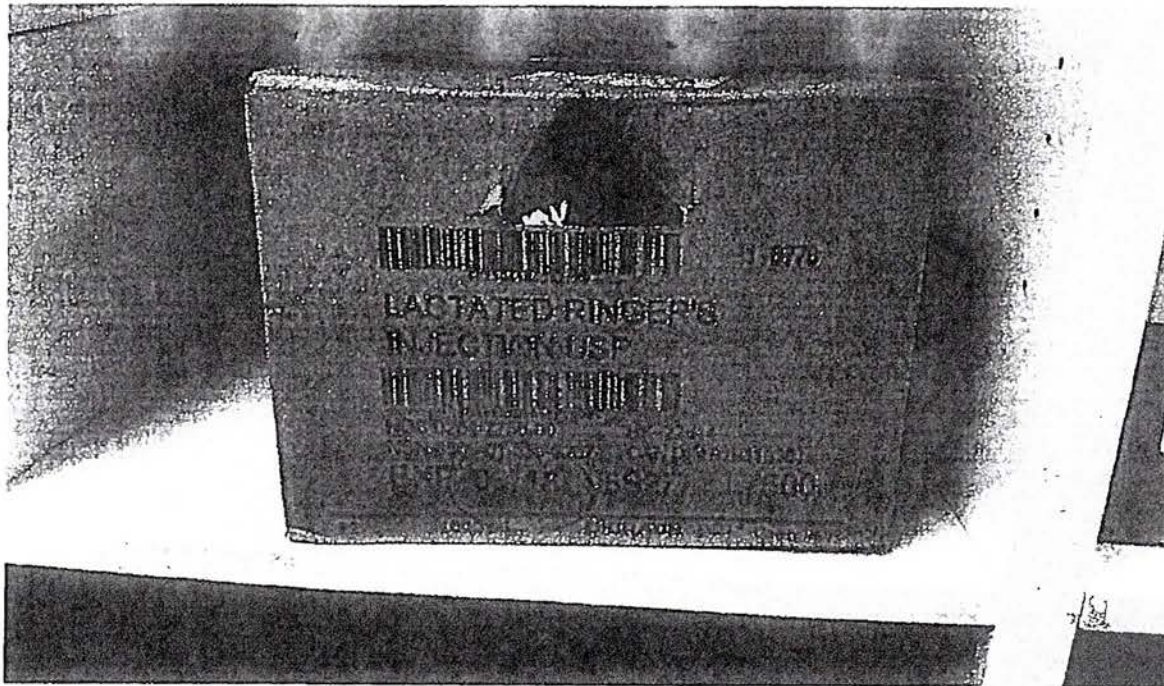
Trent S. Hiett

From: Gail []
Sent: Thursday, August 15, 2019 11:07 AM
To: Trent S. Hiett
Subject: Re: Nevada Medical Board Complaint 19-18918



Trent S. Hiett

From: Gail [I]
Sent: Thursday, August 15, 2019 11:08 AM
To: Trent S. Hiett
Subject: Re: Nevada Medical Board Complaint 19-18918





04254410 14-00001
2B8214 FOR VETERINARY USE ONLY A2012
VETERINARY 0.9% SODIUM CHLORIDE-
INJECTION USP

EXP

MAY 15

LOT

C922732



10 04254410 14-00001



Abbott

Exhibit 2

Mediation Logistics Services, Inc
800 MONTE VISTA DRIVE
DUNES, CA 92014-9117

LASV
GROUND

ONTRAC

CYNTHIA K SCHNEIDER DVM
SIERRA VETERINARY HOSPITAL
1477 N SALIMAN RD
CARSON CITY NV 89706-3273



PKID: 0308901669678683

Zone/Loc: K346 B01

Item#: 07-883 6759

LabelPg&Seq: 19 112

MfrCat#: 04925-10

PackLane: CSE

UdFM: EA of 1

0064

 Abbott

Dexpanthenol injection 250mg/ml 10 ml vial
10 exp. 1/19

Anfinitor 5mg tablets
7 exp. 2/19

Creon Capsules
84 exp. 10/18 & 11/18

Ascorbic Acid injection 500mg/ml 50 ml vial
1 exp. 1/18

Methylcobalamin injection 1000 mcg/ml 30 ml vial
1 exp. 1/19

Metoprolol tart. 50 mg tabs opened bottle of 100
exp. 5/19

Votrient 200 mg tablets
60 exp. 1/18

Lactated Ringer's injection ^{4 MRF} 1 boxes
exp. 10/18, 10/18, 3/19, 4/18

0.9% Sodium Chloride injection ^{4 MRF} 2 boxes
exp. 9/14, 5/15

True Metrix Blood glucose system Meter kits 2 boxes
exp. 5/19

Exhibit 3

Potassium Chloride for injection conc. 40mEq/2 mL 20mL vial
#25 exp. 2/18

L-Lysine HCl injection 100mg/mL 30mL vial
#9 exp. 10/18 & 12/18

Magnesium Chloride for injection 200mg/mL 50mL vial
#2 exp. 12/17

Pyridoxine HCl injection 100mg/mL 10mL vial
#6 exp. 12/18

Pyridoxine HCl injection 100mg/mL 30mL vial
#2 exp. 5/19

Lysine HCl 100mg/mL injection 50mL vial
#2 exp. 12/18

Dexamethasone injection 250mg/mL 30mL vial
#1 exp. 11/18

Folic acid injection 10mg/mL 10mL vial
#4 exp. 6/19

Medsol 1g/10mL 10mL vial
#1 exp. 11/18



Action Plan for Expired Drugs at Forsythe Cancer Care Center:

I. Ordering

The person who does the ordering of chemotherapy drugs, agents, intravenous solutions and supplies will write on a purchase order with the date, drug name, dose and amount ordered.

II. The person receiving the products must verify against the purchase order and invoice by checking and Verifying amounts received.

III. Place drug name and expiration date on flow sheet and check monthly.

IV. Stocking: person must rotate oldest date to the front and will highlight dates on boxes or vials.

Color coordination will be used on a quarterly basis for expiration dates example:

January February March: Color blue

April May June: Color Yellow

July August September : Color green

October November December: Color Red

V. All multi dose vials will be dated and initialized when opened. After twenty eight days vials need to be disposed of into the proper biohazard waste replicable.

Corrective Actions:

Effective immediately:

Monthly inspections from color codes expiration dates for all medications, intravenous solutions and agents will be posted on a calendar and reported to the medical office manager and medical director.

The medical team will check expiration dates on all chemo therapy drugs, medications, intravenous solutions and supplies before administrating to the patient. Disciplinary action will take place with staff if corrective measures are not followed.

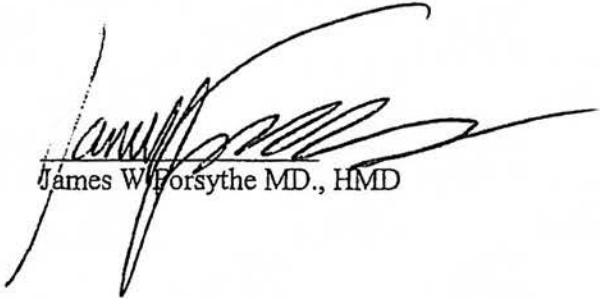

James W. Forsythe MD., HMD

Exhibit 4

The State Board of Pharmacy investigator, Joseph Depczynski, declared that he found evidence from Dr. Forsythe's storage room from the State Board of Pharmacy's raid on Dr. Forsythe's clinic from an anonymous complaint that Dr. Forsythe had expired drugs that he was dispersing from his office. One of the expired drugs was one box of Normal Saline solution that was labeled "for veterinarian use only"


Dr. Forsythe stated that he recalled the incidence. The investigator stated it was between 8 – 10 years ago that the veterinary supply of Normal Saline Solution was brought to the clinic. Dr. Forsythe stated that the office manager, Valerie Kilgore was the employee that arranged the above without his knowledge .

I, Valerie Kilgore recall the above incident that I did call the Sierra Veterinarian Hospital to obtain Normal Saline solution for the use at the Century Wellness Clinic. I spoke to our vendors who in the past had supplied the office with the orders of Normal Saline solution to administrator for infusions for homeopathic chemotherapy protocols and homeopathic immune boosting. The various suppliers stated that there was a storage of parenteral solutions throughout the United States due to the Zika virus from mosquitoes. The vendors suggested usage from a veterinarian source as they thought it was compatible and knew our request was urgent for our cancer patients.

I contacted Sierra Veterinarian Hospital because one of the veterinarian was a former in-law and was able to secure the solution but I am unable to remember the quantity. I did recall that I thought the solution was universal for human usage because the veterinarian did not seem concerned or he did not tell me it was wrong to use it on our patients. When I saw the box that the bags were in it did not state for veterinarian use only.

I can not remember if Sierra Veterinarian Hospital dropped the boxes off at 521 Hammill Lane or I picked it up in Carson City. I had Heidi help me take the supply to the back office storage room. Heidi was organizing the supply of the product and started opening the boxes for storage. I noticed right away along with Heidi that the bag had written "for veterinarian use only" to our surprise. I went to find Dr. Forsythe and he was in his office. I asked Dr Forsythe to come with me to see the labeling of the bags inside the box. Dr Forsythe saw the labeling and stated, "Get ride of this we can not use it". I told Heidi to start disposing the solution. Heidi started doing this right away under my direction. I did ask her numerous times throughout the months if she had destroyed the expired bags along with the veterinarian normal saline bags and lactated ringers and she reassured me she was in the process.

I believed Heidi as I have worked with her for over 20 years.

	9-30-19
Valerie Kilgore	Date

I was told about 10 years ago as dictated per the Pharmacy Board investigator that veterinarian IV Normal Saline solution one box was found in our storage space at 521 Hammill Lane. The box was opened and 4 bags were taken.

I remember that Valerie Kilgore, office manager ordered the veterinarian Normal Saline solution from her former in-law. There was a shortage of IV NS solution during this time and Valerie thought that the bags were universal and could be used by humans and animals. When the bags came they had veterinary use only on the bag. This was brought to Dr. Forsythe's attention immediately and he told us not to use them and to destroy them. No veterinarian IVs were used even though the investigator told me 4 bags were taken out of the box I was in the process of destroying. The investigator implied to me that those 4 bags were used on our patients. No veterinarian Normal Saline solution was used on Dr. Forsythe's patients. When I refill the IV solution draw I take all the IV bags from the bottom and place new bags below. The top bags are taken out of the draw and the back office nurse and I check the bags for expiration. I could have taken the 4 bags out of the box to destroy. Marie Mirch, attorney who was on an open phone line asked the investigator if he had a witness with him as he entered the storage room. He first said a student in training who accompanied him was with him, then he said Valerie, office manager and then he said no one at first was with him in the storage room.

The office manager and I placed the boxes in storage. I first thought they were brought to our other storage warehouse located at Longely Lane, but now remember it was at the 521 Hammill Lane storage room as I started to talk about it, it jogged my memory as I took one year off from work due to a fall and a severe concussion that left me with retrograde amnesia three years ago and I am still struggling to remember things.

The storage room is where things that expired were placed along with the things that were not. I sectioned off areas in the storage room and placed the expired things in one area and the things not expired I put in another area within the storage room. I placed the non-expired bags and supplies in the front part of the storage room. Little at a time I broke down the expired bags along with the veterinarian bags. To break them down I took them to the laundry sink and the IV sink area. I took scissors and cut the bags to drain them. I put the empty bag into the trash which is labeled the biohazard waste bin. I did not put the bags filled with fluid in the bin as the office is charged by the weight of the bin and the filled bags are very heavy.

Exhibit 6

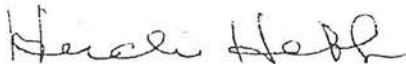
Time passed and things got shifted around in the office and chairs and a cleaning machine got stored in the closet which made it hard for me to get to the expired boxes in the back closet.

I also sorted a bundle of expired liquid vitamins days before the raid of the Pharmacy Board which I wrapped up and put a sign around them stating "expired". The bundle was placed in a certain area away from the non-expired solutions and vitamins. The Pharmacy Board investigator destroyed the wrapping and took all the products that were wrapped and placed them as evidence on the counter. The office manager took a picture of the products that were to be disposed of into the sharps' container. There was a flat of 25 expired bottles of potassium chloride that was placed above the shelf in the same area as the bundle of expired products, and vitamins. The investigator also placed them into evidence.

I thought I had emptied all the IV expired Normal Saline solution from the veterinarian boxes in the storage room. I was shocked to find out I had missed one. I also was destroying the other Normal Saline and Lactated Ringers' solution boxes that were expired. I fell behind in my work and regret the problem that Dr. Forsythe is having with the Pharmacy Board.

In my job description it is my responsibility to dispose of all expired IV solutions and products and supplies. I have been an employee of Dr. Forsythe for over twenty years.

Signed:



Heidi Hebb

9-30-19

Date

Account:30523678 Check:10312 Amount:\$243.97 Sequence:515301350 Deposited Account:920700900
Date:04/29/2014 CastureSequence:0

[illegible]

~~Exhibit 7~~

Timesheet for Brett Kandt –

JAMES FORSYTHE, MD, HMD - CASE NO. 19-144-CS-N

DATE	TIME
------	------

5/16/2021	3.50
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Review investigative file; legal research; draft Notice of Intended Action and Accusation in Case 19-144-CS-N.

6/18/2021	3.25
-----------	------

Review notice from opposing counsel regarding representation, Respondent's motion for extension of time to respond hearing, and request for discovery in Case 19-144-CS-N; draft continuance notice and confer with staff regarding compiling and bate-stamping all responsive documents; confer with opposing counsel.

7/19/2021	1.75
-----------	------

Review Respondent's motion to dismiss/motion for more definite statement in Case 19-144-CS-N.

7/21/2021	4.50
-----------	------

Research, draft, file and serve opposition to Respondent's motion in Case 19-144-CS-N.

7/22/2021	3.75
-----------	------

Review Respondent's Answer and Notice of Defense; draft, file and serve erratum to opposition, confer with staff regarding production of bate-stamped case file and witness list in response to discovery request in Case 19-144-CS-N.

9/16/2021	3.25
-----------	------

Confer with opposing counsel regarding merits of case and potential resolution; review case file and prepare for hearing and confer with Investigator Depczynski in Case 19-144-CS-N.

9/17/2021	0.75
-----------	------

Confer with opposing counsel regarding merits of case and potential resolution in Case 19-144-CS-N.

9/22/2021	0.25
-----------	------

Confer with opposing counsel regarding continuance in Case 19-144-CS-N.

10/4/2021	2.50
-----------	------

Research, draft, file and serve First Amended Notice of Intended Action and Accusation in Case 19-144-CS-N.

11/2/2021	0.50
-----------	------

Review Respondent's Answer and Notice of Defense to First Amended Accusation in Case 19-144-CS-N.

11/16/2021 1.75

Prepare for hearing in Case 19-144-CS-N; confer with staff and witnesses and prepare proposed exhibits.

11/18/2021 0.75

Confer with opposing counsel regarding merits of case and request for fourth continuance in Case 19-144-CS-N.

11/22/2021 0.50

Confer with opposing counsel regarding merits of case and request for fourth continuance in Case 19-144-CS-N; confer with Investigator Depczynski and prepare for hearing.

11/23/2021 4.75

Review Respondent's motion to for continuance in Case 19-144-CS-N; research, draft, file and serve opposition to Respondent's motion. Prepare proposed exhibits for hearing; provide documentation of attorney's fees and recoverable costs to Respondent.

12/7/2021 3.50

Review Respondent's second motion to dismiss/motion for more definite statement in Case 19-144-CS-N; research, draft, file and serve opposition to Respondent's motion.

1/5/2022 0.50

Provide updated documentation of attorney's fees and recoverable costs to Respondent; confer with Investigator Depczynski and prepare for hearing in Case 19-144-CS-N.

1/12/2022 1.00

Hearing in Case 19-144-CS-N.

TOTAL 34.75 hours x \$65.00/hour = \$2258.75

Timesheet for Shirley Hunting –

JAMES FORSYTHE, MD, HMD - CASE NO. 19-144-CS-N

DATE TIME

Date	Hours	Activity
05/28/21	.50	Prepared Accusation for filing
06/09/21	.50	Prepared Accusation for mailing/serving
10/04/21	.50	Prepared First Amended Accusation for filing
10/06/20	.50	Prepared First Amended Accusation for mailing/serving

Total Hours 2

Rate 38.77

Total Costs 77.54

Timesheet for Kris Mangosing –

JAMES FORSYTHE, MD, HMD - CASE NO. 19-144-CS-N

DATE **TIME**

Date	Hours	Activity
7/22/2021	1	Completed request for discovery
11-16-2021	.50	Prepared documents for Board meeting

Total Hours 2

Rate 31.86

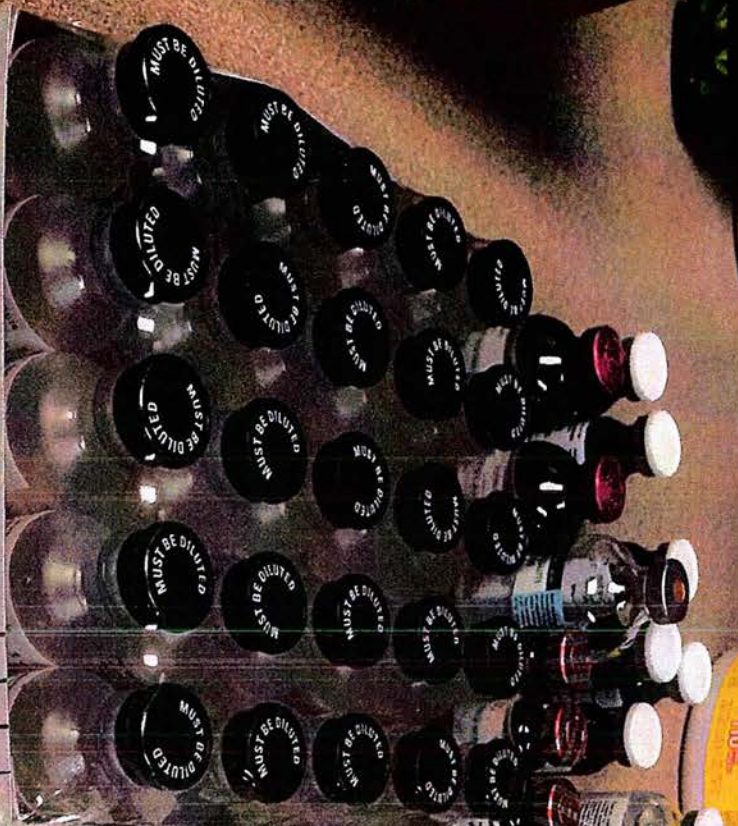
Total Costs 47.79



Potassium Chloride
for Injection Concentrate, USP
40 mEq/20 mL (2 mEq/mL)
CONCENTRATE
MUST BE DILUTED BEFORE USE

33 units/MC 0407-653-05
Rx only
20 mL Single-dose
For intravenous use.

100 mg/mL
NDC 13304-040-05



35% MORE | 3X more power
KILLS 99.9% OF VIRUSES & BACTERIA
DISINFECTING WIPES
110

Lysol

McGUFF 1877444153
Depo-Provera
Depot Medroxyprogesterone acetate 250 mg/mL, 10 mL SDV
To be given parenterally as directed in package insert

McGUFF 1877444153
Depo-Provera
Depot Medroxyprogesterone acetate 250 mg/mL, 10 mL SDV
To be given parenterally as directed in package insert

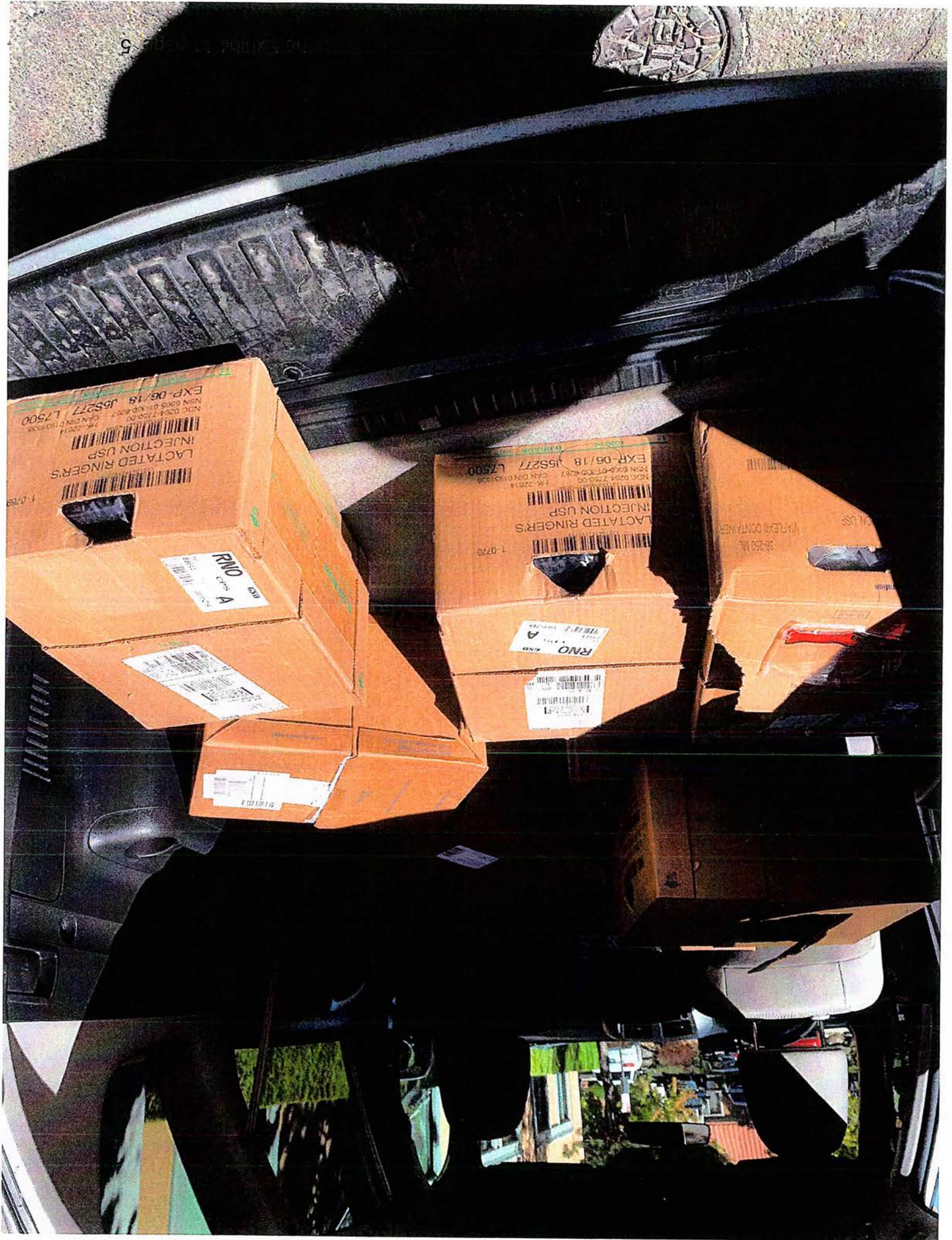
McGUFF 1877444153
Depo-Testosterone
Testosterone cypionate 250 mg/mL, 10 mL SDV
To be given parenterally as directed in package insert



St. Marys Hosp.
NPI: 1801152566
TAX: 45-4989022



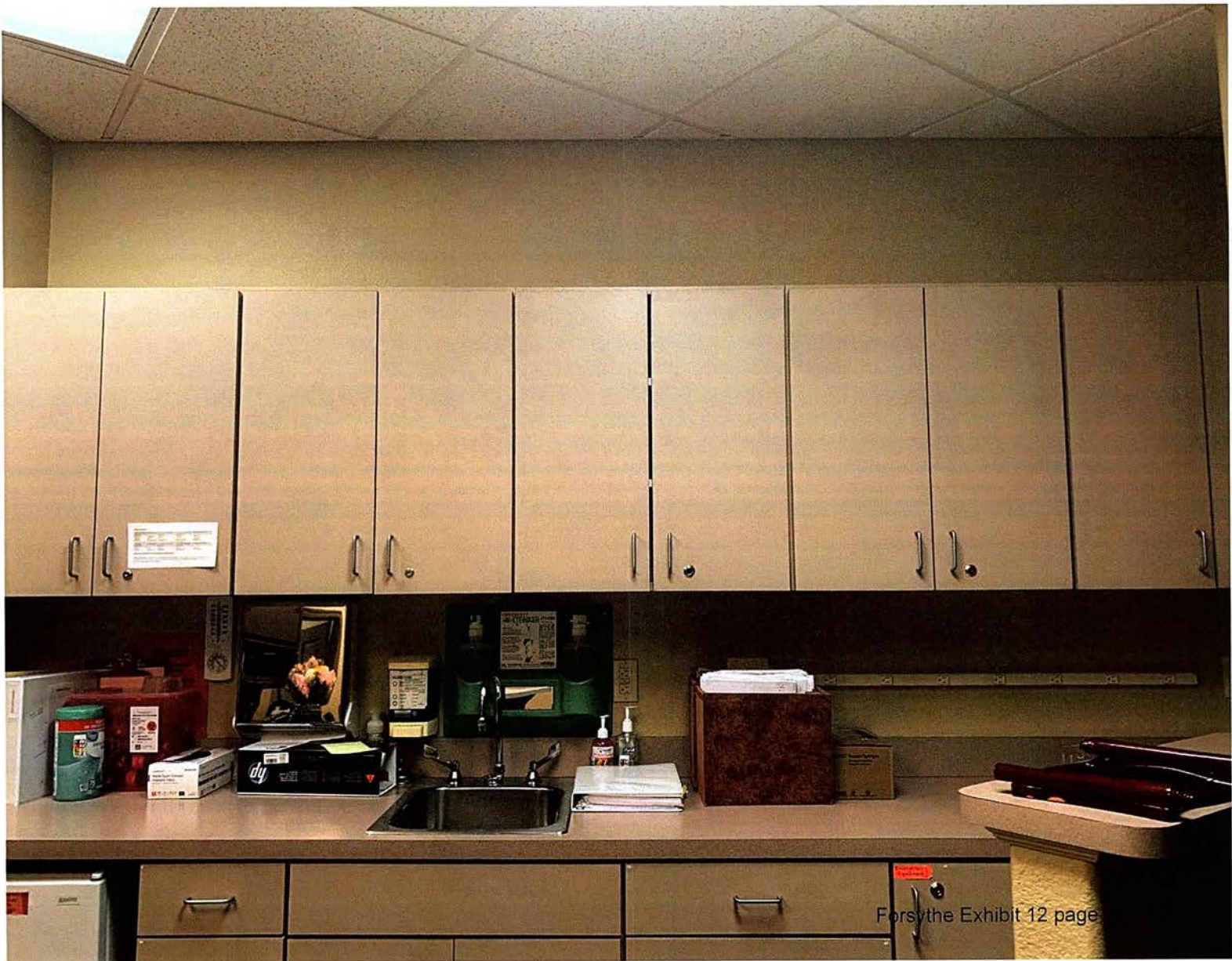


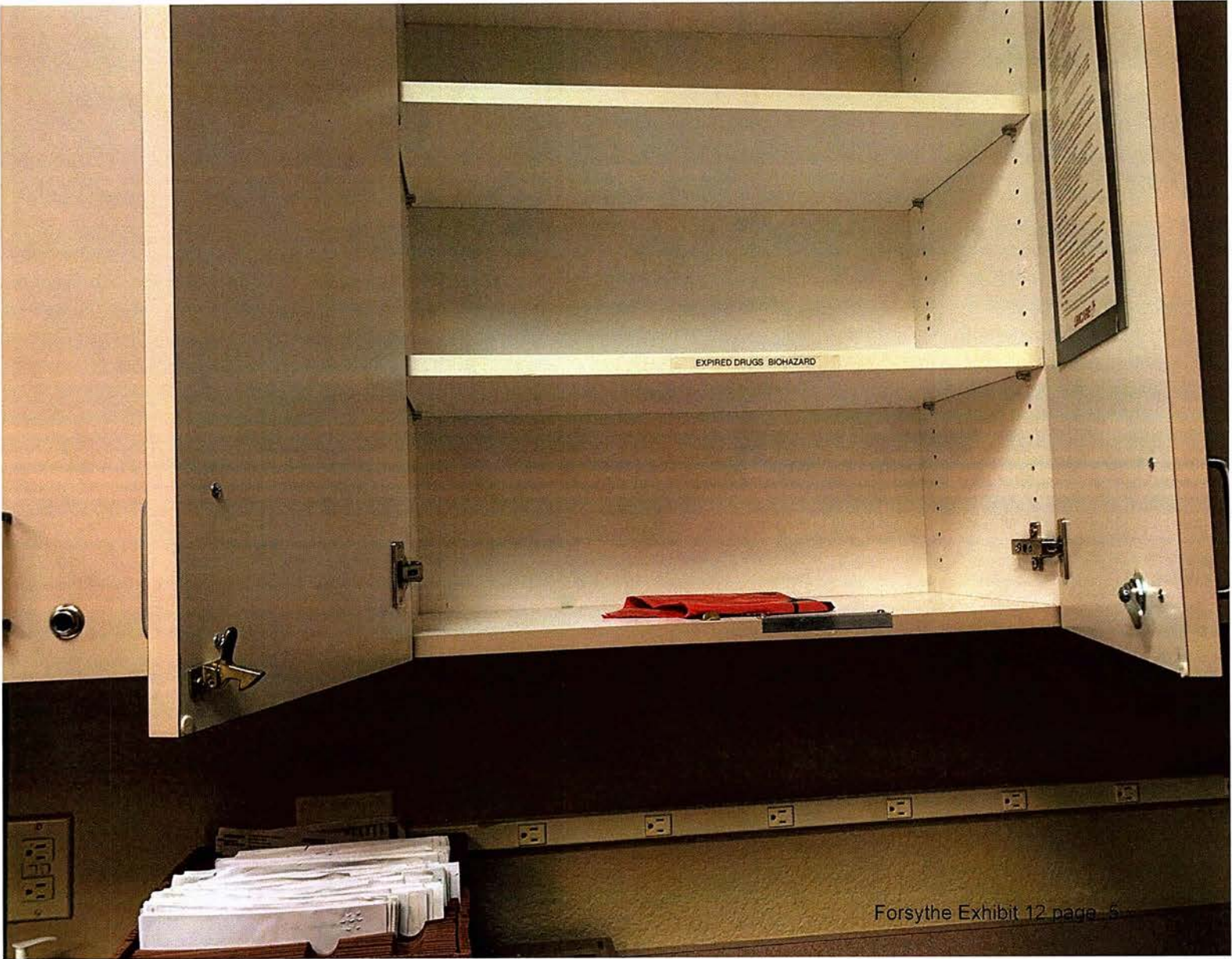






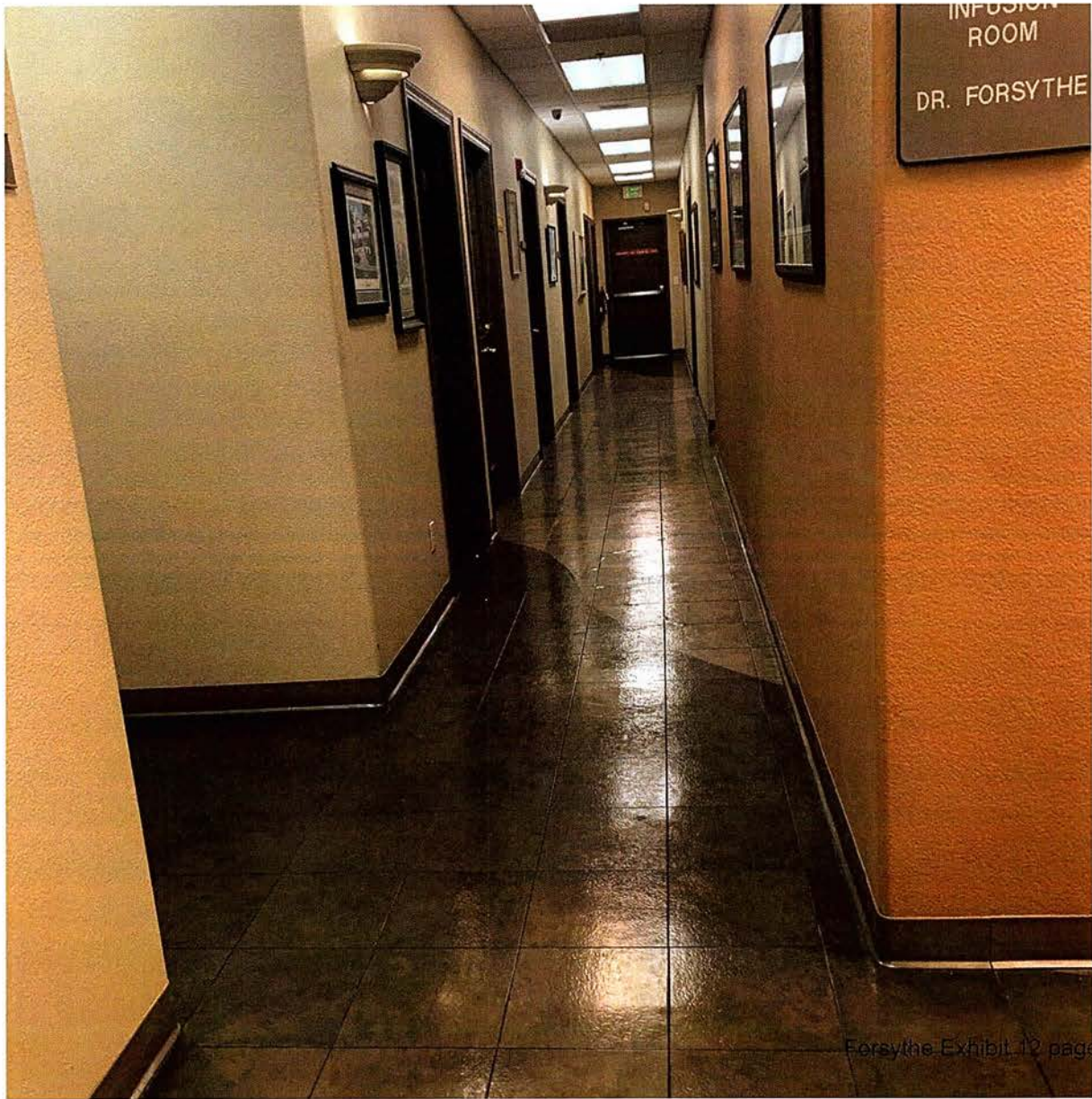








Forsythe Exhibit 12





October 25, 2021

Nevada State Board of Pharmacy
431 W Plumb Lane
Reno, Nevada 89509

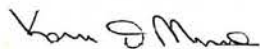
Re: Notice of Probation
The Hilsinger Company Parent LLC
Wholesale Distributor License #: WHO2862, WHO2097

Dear Licensing Authority:

On June 9, 2021 the Missouri State Board of Pharmacy issued The Hilsinger Company Parent LLC a drug distributor license subject to probation. This probation is in response to delays in processing our change of ownership application to obtain our new Missouri wholesale distributor license under our new ownership. Unfortunately, due to the complexities of preparing the CHOW application and other required filings, the demands of effectuating the transaction, the delays associated with remote work days across departments due to the Coronavirus Disease 2019 ("COVID-19), and the need to gather various signatures and information from personnel, we were unable to formally submit the CHOW application within the desired timeline.

If you need any additional information, please feel free to call or email at the address below.

Kind Regards,



Kenneth Miranda
Chief Operating Officer
Hilco Vision
KMiranda@Hilco.com



Michael L. Parson
Governor
State of Missouri

Sheila Solon, Acting Division Director
DIVISION OF PROFESSIONAL REGISTRATION

Missouri Department of
Commerce & Insurance
Chlora Lindley-Myers, Director

MISSOURI BOARD OF PHARMACY
3605 Missouri Boulevard P.O. Box 625
Jefferson City, MO 65109
573-751-0091
573-526-3464 FAX
800-735-2966 TTY Relay Missouri
800-735-2466 Voice Relay Missouri

USPS First Class and
CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9314 8699 0430 0083 3098 89

Kimberly A. Grinston
Executive Director
MissouriBOP@pr.mo.gov
pr.mo.gov/pharmacists

June 9, 2021

Jonathan Costa, MIC
The Hilsinger Company Parent LLC d/b/a Hilco Vision
33 W. Bacon St.
Plainville, MA 02762

Dear Mr. Costa:

Enclosed is a copy of the fully executed **ORDER OF THE MISSOURI BOARD OF PHARMACY ISSUING THE HILSINGER COMPANY PARENT LLC A DRUG DISTRIBUTOR LICENSE SUBJECT TO PROBATION** regarding the discipline of Missouri drug distributor permit #2021021107. The order is effective June 9, 2021. The drug distributor permit is also enclosed.

You should review each term of this order and comply with the requirements as set forth. Compliance with this Agreement is your responsibility; reminders will not be sent from this office. Failure to comply with the terms of this Agreement may result in a violation hearing before the Board.

Enclosed are two copies of the Licensee Report of Discipline Compliance form for use in submitting the six-month reports required by the Order. Your first report is due July 1, 2021. This form may be copied as needed for future use, and is also available on our website at www.pr.mo.gov/pharmacists.asp, click Applications and Forms, under Miscellaneous.

Sincerely,

JENNIFER BOEHM
ADMINISTRATIVE COORDINATOR

Enclosure

cc: Ken Miranda, Corporate Officer, CERTIFIED MAIL TRACKING # 9314 8699 0430 0083 3099 40
Daryl Hylton, Attorney

BEFORE THE
MISSOURI BOARD OF PHARMACY
STATE OF MISSOURI

IN RE:

THE HILSINGER COMPANY PARENT LLC
d/b/a HILCO VISION
33 W Bacon St.
Plainville, MA 02762

)
)
)
)
)
)

ORDER OF THE MISSOURI BOARD OF PHARMACY
ISSUING THE HILSINGER COMPANY PARENT LLC
A DRUG DISTRIBUTOR LICENSE
SUBJECT TO PROBATION

Comes now the Missouri Board of Pharmacy ("Board") and issues its ORDER granting a PROBATED drug distributor license, license number 2021021107, to THE HILSINGER COMPANY PARENT LLC (Hilco Vision) pursuant to the provisions of Section 324.038, RSMo. As set forth in Section 324.038, RSMo, Hilco Vision may submit a written request for a hearing to the Administrative Hearing Commission seeking review of the Board's decision to issue a probated license to Hilco Vision. Such written request must be submitted to the Administrative Hearing Commission within thirty (30) days of issuance of this Order. The written request should be addressed to the Administrative Hearing Commission, P.O. Box 1557, Jefferson City, MO 65102-1557. If no written request for review is received by the Administrative Hearing Commission within the thirty (30) day period, the right to seek review of the Board's decision shall be waived.

The disciplinary period shall become effective immediately upon issuance of Hilco Vision drug distributor license. Should Hilco Vision file a written request for review of this Order, the terms and conditions of the Order

shall remain in force and effect unless and/or until such time as the Administrative Hearing Commission issues an order contrary to this Order.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The Board is an agency of the State of Missouri created and established pursuant to Section 338.110, RSMo, for the purpose of executing and enforcing provisions of Chapter 338, RSMo.

2. On September 9, 2019, "The Hilsinger Company Parent LLC" became owners of the facility located at 33 W. Bacon St., Plainville, Massachusetts. However, they did not file an application for a drug distributor license under the new ownership with the Board until November 5, 2020. The license issued pursuant to this Order is in response to that application.

3. During the period September 9, 2019 through January 17, 2021, Hilco Vision distributed over 10,000 units of drugs into Missouri without an active Missouri drug distributor license.

4. Section 338.333, RSMo prohibits acting as a drug distributor without first obtaining a license to do so from Missouri.

5. Hilco Vision's conduct as alleged above is cause for the Board to deny Hilco Vision licensure as a drug distributor pursuant to Section 338.055.1 and .2, RSMo, which states in pertinent parts:

1. The board may refuse to issue any certificate of registration or authority, permit or license required pursuant to this chapter for one or any combination of causes stated in subsection 2 of this section or if the designated pharmacist-in-charge, manager-in-charge, or any officer, owner, manager, or controlling shareholder of the applicant has committed any act or practice in subsection 2 of this section.

2. The board may cause a complaint to be filed with the administrative hearing commission as provided by chapter 621, RSMo, against any holder of any certificate of registration or authority, permit or license required by this chapter or any person who has failed to renew or has surrendered his or her certificate of registration or authority, permit or license for any one or any combination of the following causes:

* * *

(6) Violation of, or assisting or enabling any person to violate, any provision of this chapter, or of any lawful rule or regulation adopted pursuant to this chapter;

6. Section 324.038.1, RSMo, provides in pertinent part:

1. Whenever a board within or assigned to the division of professional registration, including the division itself when so empowered, may refuse to issue a license for reasons which also serve as a basis for filing a complaint with the administrative hearing commission seeking disciplinary action against a holder of a license, the board, as an alternative to refusing to issue a license, may, at its discretion, issue to an applicant a license subject to probation.

ORDER

7. Based on the foregoing, it is the ORDER of the Missouri Board of Pharmacy that, in lieu of denying licensure as a drug distributor, the Board hereby issues Hilco Vision drug distributor license number 2021021107 subject to **PROBATION** for a period of **TWO YEARS**. This Order shall become effective on the date issued. The terms of probation shall be:

A. Hilco Vision shall pay all required fees for licensing to the Board and shall renew its drug distributor license prior to October 31 of each licensing year.

B. Hilco Vision shall comply with all provisions of Chapter 338, Chapter 195, and all applicable federal and state drug laws, rules and regulations and with all federal and state criminal laws. "State" here includes the State of Missouri and all other states and territories of the United States.

C. If, after disciplinary sanctions have been imposed, Hilco Vision fails to keep its drug distributor license current, the period of unlicensed status shall not be deemed or taken as any part of the time of discipline so imposed.

D. Hilco Vision shall report to the Board, on a preprinted form supplied by the Board office, once every six (6) months (due by each January 1 and July 1), beginning with whichever date occurs first after this Agreement becomes effective, stating truthfully whether or not it has complied with all terms and conditions of its disciplinary order.

E. Hilco Vision shall make a representative available for personal interviews to be conducted by a member of the Board or the Board of Pharmacy staff. Said meetings will be at the Board's discretion and may occur periodically during the disciplinary period. Hilco Vision will be notified and given sufficient time to arrange these meetings.

F. Hilco Vision's failure to comply with any condition of discipline set forth herein constitutes a violation of this

Order.

8. Upon the expiration of said probation, Hilco Vision's license as a drug distributor in Missouri shall be fully restored if all other requirements of law have been satisfied provided, however, that in the event the Board determines that Hilco Vision has violated any term or condition of this Order, the Board may, in its discretion, after an evidentiary hearing, vacate and set aside the discipline imposed herein and may suspend, revoke, or otherwise lawfully discipline Hilco Vision


9. No order shall be entered by the Board pursuant to the preceding paragraph of this Settlement Agreement without notice and an opportunity for hearing before the Board in accordance with the provisions of Chapter 536, RSMo.

10. If the Board determines that Hilco Vision has violated a term or condition of this Order, which violation would also be actionable in a proceeding before the Administrative Hearing Commission or the circuit court, the Board may elect to pursue any lawful remedies or procedures afforded it and is not bound by this Order in its determination of appropriate legal actions concerning that violation. If any alleged violation of this Order occurred during the disciplinary period, the Board may choose to conduct a hearing before it either during the disciplinary period, or as soon thereafter as a hearing can be held to determine whether a violation occurred and, if so, it may impose further discipline. The Board retains jurisdiction to hold a hearing to determine if a violation of this Order has occurred.

11. The Board of Pharmacy will maintain this Agreement as an open record of the Board as provided in Chapters 324, 338, 610, RSMo.

SO ORDERED this 9TH day of JUNE, 2021.

BOARD SEAL



KIMBERLY A. GRINSTON
EXECUTIVE DIRECTOR
MISSOURI BOARD OF PHARMACY

State of Missouri

Division of Professional Registration

**Licensed Drug Distributor
Out of State Wholesale**

VALID THROUGH OCTOBER 31, 2021
ORIGINAL CERTIFICATE/LICENSE NO. 2021021107
THE HILSINGER COMPANY PARENT LLC
HILCO VISION
JONATHAN COSTA, MIC
33 W BACON ST
PLAINVILLE MA 02762
USA

THE HILSINGER COMPANY PARENT LLC
HILCO VISION
JONATHAN COSTA, MIC
33 W BACON ST
PLAINVILLE MA 02762
USA

State of Missouri

**Missouri Department of Commerce and Insurance
Division of Professional Registration**

**Missouri Board of Pharmacy
Licensed Drug Distributor**

Out of State Wholesale

VALID THROUGH OCTOBER 31, 2021
ORIGINAL CERTIFICATE/LICENSE NO. 2021021107
Jonathan Costa
THE HILSINGER COMPANY PARENT LLC
HILCO VISION
JONATHAN COSTA, MIC
33 W BACON ST
PLAINVILLE MA 02762
USA


EXECUTIVE DIRECTOR


DIVISION DIRECTOR



STATE OF MISSOURI
DIVISION OF PROFESSIONAL REGISTRATION
**PHARMACY AND DRUG DISTRIBUTOR REPORT OF
DISCIPLINE COMPLIANCE**

MAILING ADDRESS:
MISSOURI BOARD OF PHARMACY
P.O. BOX 625
JEFFERSON CITY, MO 65102
(573) 751-9056
(573) 526-3464 (FAX)
E-MAIL: COMPLIANCE@PR.MO.GOV
DELIVERY ADDRESS:
3605 MISSOURI BOULEVARD
JEFFERSON CITY, MO 65109

INSTRUCTIONS:

1. This form MUST be completed/signed by the sole proprietor, partner or corporate officer of the pharmacy/drug distributor.
2. Fill in all blanks and answer all questions completely and accurately.

LICENSEE INFORMATION

PHARMACY/DRUG DISTRIBUTOR NAME The Hilsinger Company Parent LLC	LICENSE NO. 2021021107	DATE 6/23/21
PHARMACY/DRUG DISTRIBUTOR ADDRESS (STREET, CITY, STATE ZIP CODE) 33 W Bacon Street, Plainville, MA 02762	CURRENT TELEPHONE NUMBER 800-486-6169	
PHARMACY/DRUG DISTRIBUTOR E-MAIL ADDRESS JCosta@Hilco-usa.com	ALTERNATE TELEPHONE NUMBER N/A	
PHARMACIST/MANAGER-IN-CHARGE NAME Jonathan Costa	LICENSE NO. (IF APPLICABLE) N/A	
MISSOURI LICENSE STATUS IS <input checked="" type="checkbox"/> ACTIVE <input type="checkbox"/> INACTIVE <input type="checkbox"/> EXPIRED	IF "EXPIRED," DATE LICENSE EXPIRED N/A	
HAS THIS PHARMACY/DRUG DISTRIBUTOR CHANGED LOCATIONS IN THE PAST SIX (6) MONTHS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, WAS THE CHANGE OF LOCATION REPORTED TO THE BOARD OFFICE? <input type="checkbox"/> YES <input type="checkbox"/> NO	
HAS THIS PHARMACY/DRUG DISTRIBUTOR FILED ANY DEA OR BNDD LOSS REPORTS IN THE PAST SIX (6) MONTHS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO (IF YES, ATTACH COPIES TO THIS REPORT)		

THE FOLLOWING IS A CURRENT LIST OF PARTNERS/CORPORATE OFFICERS OF THIS PHARMACY/DRUG DISTRIBUTOR (ATTACH SEPARATE SHEET IF NECESSARY)

NAME Paul Janell	TITLE CFO
NAME Kenneth Miranda	TITLE COO
NAME	TITLE
NAME	TITLE
NAME	TITLE
NAME	TITLE

THE FOLLOWING IS A LIST OF ALL FULL-TIME AND PART-TIME LICENSED/REGISTERED PHARMACISTS, INTERNS, TECHNICIANS PERFORMING DUTIES AT THIS PHARMACY/DRUG DISTRIBUTOR (ATTACH SEPARATE SHEET IF NECESSARY)

NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION
NAME	LICENSE NUMBER	POSITION

COMPLIANCE STATEMENT

DATES OF MISSOURI DISCIPLINE

PROBATION 6/9/21 TO 6/9/23

HAVE YOU REVIEWED THE PHARMACY/DRUG DISTRIBUTOR'S DISCIPLINARY ORDER/SETTLEMENT AGREEMENT IN THE LAST SIX (6) MONTHS?

☒ YES ☐ NO

I/WE HAVE DONE THE FOLLOWING TO COMPLY WITH EACH REQUIREMENT OF THE DISCIPLINARY ORDER/SETTLEMENT AGREEMENT. (ATTACH SEPARATE SHEET IF NECESSARY)

In response to Missouri Probation Notice dated June 9, 2021

A. Hilco Vision has paid all required fees for licensing to the State board and is actively working on its October 31, renewal.

B. Hilco Vision expects to fully comply with all Provisions as noted and has engaged License Logix (LLX) to support our efforts. This process is being managed by a dedicated Regulatory Affairs Specialist at Hilco Vision.

D. Hilco Vision has implemented a renewal and reminder process with License Logix, with oversight by our regulatory Affairs Specialist to ensure we comply with all applicable regulations and submit semi-annual compliance updates.

E. Our Designated Representative, Jon Costa is available to answer Board of Pharmacy questions when applicable

F We recognize it is our responsibility to comply with this order.

The team has implemented weekly review meetings to review and ensure all filings and compliance items are addressed promptly. This team has the full support of Executive Management

CONSULTANT INFORMATION

If a consultant is a requirement of your discipline, answer the following.

NAME OF CONSULTANT

CONSULTANT TELEPHONE NUMBER

ADDRESS OF CONSULTANT

DATE OF LAST VISIT

DATE OF NEXT VISIT

CONSULTANT E-MAIL ADDRESS

LIST ANY CHANGE YOU HAVE MADE TO YOUR OPERATION BASED ON YOUR CONSULTANT'S LAST REPORT (ATTACH ADDITIONAL SHEETS IF NECESSARY).

By my signature below, I hereby attest that I am a partner, corporate officer, or the sole proprietor of the pharmacy/drug distributor named in this compliance report, and the report has been completed knowingly, truthfully and completely, without omissions. I understand that this pharmacy/drug distributor must comply with federal and state laws and regulations, including that the facility shall maintain a pharmacist/manager-in-charge for the facility and such pharmacy/drug distributor shall be conducted and operated in full compliance with state and federal laws and regulations. All the information contained in the report and any attachments hereto are true and correct to my best knowledge and belief. I understand that any false statement or material omission may result in discipline or further penalty under state law. I hereby certify under the penalty of perjury that the above statement, as well as all information provided herein are true and correct.

SIGNATURE OF SOLE PROPRIETOR, PARTNER OR CORPORATE OFFICER

DATE

6/24/21

PRINT NAME

Paul Janell

TITLE

CFO

SFY22 MONTHLY BUDGET REPORT
NEVADA STATE BOARD OF PHARMACY
CURRENT MONTH: Dec 21

REVENUES	APPROVED BUDGET	BUDGET AMENDMENTS	REVISED BUDGET	CURRENT MONTH REVENUE/EXPENSE	PRIOR MONTH(S) REVENUE/EXPENSE	PROJECTIONS THROUGH 6/30/2022	TOTAL REVENUE/EXPENSE SFY22	DIFFERENCE
Beginning Balance	\$ 4,267,562	\$ 125,940	\$ 4,393,502	\$ -	\$ 4,393,502	\$ -	\$ 4,393,502	\$ -
Renewal Fees	\$ 1,512,000		\$ 1,512,000	\$ 2,500	\$ 1,521,078	\$ -	\$ 1,523,578	\$ 11,578
Registration Fees	\$ 668,834		\$ 668,834	\$ 88,900	\$ 698,854	\$ 20,000	\$ 807,754	\$ 138,920
Recovered Costs	\$ -	\$ 15,000	\$ 15,000	\$ 1,000	\$ 25,977	\$ 26,977	\$ 53,954	\$ 38,954
CC Processing Fees	\$ -	\$ 75,000	\$ 75,000	\$ 2,439	\$ 91,200	\$ 17,070	\$ 110,708	\$ 35,708
Change MGR RPh	\$ -	\$ 7,500	\$ 7,500	\$ 1,050	\$ 4,100	\$ 5,150	\$ 10,300	\$ 2,800
Inspections	\$ -	\$ 750	\$ 750	\$ -	\$ 150	\$ 150	\$ 300	\$ (450)
Interest Income	\$ 15,000		\$ 15,000	\$ -	\$ 2,702	\$ 2,702	\$ 5,405	\$ (9,595)
Indirect Grant Income	\$ 2,670	\$ (2,670)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Late Fees	\$ 17,530		\$ 17,530	\$ 600	\$ 8,460	\$ 9,060	\$ 18,120	\$ 590
Unclaimed Property Refund	\$ -	\$ 28,050	\$ 28,050	\$ -	\$ 28,050	\$ -	\$ 28,050	\$ -
Total Revenues	\$ 6,483,596	\$ 249,570	\$ 6,733,166	\$ 96,489	\$ 6,774,074	\$ 81,109	\$ 6,951,672	\$ 218,506

EXPENSES								
Payroll	\$ 3,340,540		\$ 3,340,540	\$ 261,382	\$ 1,292,013	\$ 1,574,140	\$ 3,127,535	\$ (213,005)
Operating	\$ 825,000		\$ 825,000	\$ 36,387	\$ 251,584	\$ 401,251	\$ 689,221	\$ (135,779)
Equipment	\$ 30,000		\$ 30,000	\$ -	\$ 7,409	\$ 22,591	\$ 30,000	\$ -
In-State Travel	\$ 110,000		\$ 110,000	\$ 13,346	\$ 25,461	\$ 71,194	\$ 110,000	\$ -
Out-of-State Travel	\$ 65,000		\$ 65,000	\$ -	\$ -	\$ 65,000	\$ 65,000	\$ -
DAG Cost	\$ 12,000		\$ 12,000	\$ -	\$ 3,570	\$ 8,430	\$ 12,000	\$ -
Aid for Education	\$ 2,000		\$ 2,000	\$ -	\$ -	\$ 2,000	\$ 2,000	\$ -
Reserve	\$ 2,099,056	\$ 249,570	\$ 2,348,626	\$ -	\$ -	\$ -	\$ 2,915,916	\$ 567,290
Total Expenses	\$ 6,483,596	\$ 249,570	\$ 6,733,166	\$ 311,114	\$ 1,580,036	\$ 2,144,606	\$ 6,951,672	\$ 218,506
Balance	\$ -	\$ -	\$ -				\$ -	\$ -

Nevada Board of Pharmacy
985 Damonte Ranch Parkway, Suite 206
Reno, NV 89521
RE: R036-21RP1

January 12, 2022

Dear Nevada Board of Pharmacy,

I am expressing concern for the adoption of this regulation as written. The goal of this bill was to eliminate unnecessary barriers and allow improved access to hormonal contraceptives for Nevadans, however, it does not address the barrier that remains for patients receiving care from a pharmacist practicing outside of a licensed pharmacy. This is especially concerning, given that many of these pharmacists have attained additional education, training, and board certifications in pharmacy practice and established relationships with patients in their communities.

As an example, I have approval from the NVBOP to practice pharmacy at an outpatient community clinic without a licensed pharmacy. In this comprehensive opioid treatment center, I provide comprehensive medication management for diabetes, hypertension, dyslipidemia, and thyroid disease under collaborative practice agreement (CPA) to our patients in recovery. I am authorized to initiate, modify, or discontinue medications, order and interpret laboratory results, and provide physical assessment to patients within the practice. I was hopeful that this legislation and regulation change would allow me to screen and recommend hormonal contraception to my patients who have issues with getting into an ob-gyn practice and need contraceptive health as soon as possible given their risk of unintended pregnancy. However, after review of this bill and consult with NVBOP representatives, I learned the only way for me to address this barrier is to have the providers sign an additional CPA surrounding contraceptive health. Unfortunately, this has created a barrier of its own as I seek to generate an addition CPA with each of the providers in my clinics, manage the requirements of the CPA, and renew these annually. Only 2 of the 6 providers have signed this CPA, meaning that I can only provide this service to approximately one-third of our patients. The only other option is for me, a pharmacist trained and certified in hormonal contraceptive health, to refer my patients to a licensed pharmacy participating in pharmacist dispensed hormonal contraception.

I ask the Board to consider changing the language to allow qualified pharmacists practicing outside of a licensed pharmacy a means to consult, screen, and counsel on contraceptive health, as well as dispense or prescribe hormonal contraceptives to our patients.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Krystal Riccio', with a large, stylized circular flourish at the end.

Krystal Riccio, PharmD, BCACP, CDCES
Clinical Pharmacist, Center for Behavioral Health
Associate Professor of Pharmacy Practice, Roseman University of Health Sciences