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NEVADA STATE BOARD OF PHARMACY  
**OFFICE OF THE GENERAL COUNSEL**

WRITER'S DIRECT DIAL: (775) 850-1440 • E-MAIL: [bkandt@pharmacy.nv.gov](mailto:bkandt@pharmacy.nv.gov) • FAX: (775) 850-1444

June 21, 2019

VIA U.S. MAIL and EMAIL TO [mdushoff@kinevada.com](mailto:mdushoff@kinevada.com)

Matthew T. Dushoff, Esq.  
 Kolesar & Leatham, Chtd.  
 400 South Rampart Blvd., Suite 400  
 Las Vegas, NV 89145

**Re: Notice of Involuntary Closure of Pharmacy and Right to Hearing -  
 ACRX Specialty Pharmacy, Certificate of Registration No. PH03673**

Dear Mr. Dushoff:

This will confirm that Nevada State Board of Pharmacy (Board) has taken necessary action pursuant to NAC 639.570 to effectuate an involuntary closure of your client Jerry Igbinovia's pharmacy, ACRX Specialty Pharmacy, located at 3200 Soaring Gulls Drive, Suite #101 Las Vegas, NV 89129. That involuntary closure was necessary after federal law enforcement agents arrested your client and seized ACRX Specialty Pharmacy's computer system on June 20, 2019, rendering the pharmacy unable to operate in conformance with applicable law.

Pursuant to NRS 233B.121, your client may request a hearing before the Board to contest ACRX Specialty Pharmacy's involuntary closure by submitting a written request to the Board's Reno office, located at 985 Damonte Ranch Parkway – Suite 206, Reno, NV 89521.

Please be aware that the forgoing does not preclude a formal investigation, summary suspension pursuant to NRS 233B.127(3), or filing of an accusation pursuant to NRS 639.241. If you have any questions, please do not hesitate to contact me at 775-850-1440 or [bkandt@pharmacy.nv.gov](mailto:bkandt@pharmacy.nv.gov).

Best regards,

Brett Kandt  
 General Counsel  
 Nevada State Board of Pharmacy

**KOLESAR & LEATHAM**

ATTORNEYS AT LAW

400 SOUTH RAMPART BLVD., SUITE 400

LAS VEGAS, NEVADA 89145

702.362.7800

knevada.com

June 25, 2019

**VIA U.S. MAIL and e-mail: [pedwards@pharmacy.nv.gov](mailto:pedwards@pharmacy.nv.gov)**

NEVADA STATE BOARD OF PHARMACY  
Attention: Paul Edwards, Esq.  
985 Damonte Ranch Parkway, Suite 206  
Reno, NV 89521

**Re: Request for a Hearing on the Involuntary Closure of Pharmacy and Right  
to a Hearing  
ACRX Specialty Pharmacy, Certificate of Registration No. PH03673**

Dear Mr. Edwards:

ACRX Specialty Pharmacy has retained the services of Kolesar & Leatham to represent them in the above referenced matter. Pursuant to NRS 233.121, my client is requesting a hearing before the Board to contest ACRX's involuntary closure. Please forward all further correspondence directly to me at: Kolesar and Leatham, 400 South Rampart Blvd., Suite 400, Las Vegas, NV 89145, or [mdushoff@knevada.com](mailto:mdushoff@knevada.com). My direct line at my office is 702-889-7761. Thank you

Respectfully yours,

**KOLESAR & LEATHAM**

Matthew T. Dushoff, Esq.

MTD/mab