



NEVADA STATE BOARD OF PHARMACY

985 Damonte Ranch Parkway – Suite 206 • Reno, NV 89521

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

• Web Page: bop.nv.gov

December 11, 2019

VIA CERTIFIED U.S. MAIL

Tuan Dinh, RPh
Deeflat Pharmacy
2580 HWY 95 – Suite 106
Bullhead City, AZ 86442

Re: CITATION: Unregistered Operation of Pharmacy

Dear Mr. Dinh:

In the course of an investigation by the Nevada State Board of Pharmacy (Board), you admitted to Board investigators that Deeflat Pharmacy engaged in unlicensed operation in Nevada by delivering drug prescriptions to patients in the State from May - August 2019.

This letter shall serve as a CITATION pursuant to NRS 639.2895(2), for your unlicensed operation of a pharmacy. The Board has assessed you an administrative fine of five thousand dollars (\$5,000.00) pursuant to NRS 639.2895(3).

You must pay this administrative fine within 30 days of receipt of this citation, or otherwise contact Board staff to request an alternative payment plan. Payment must be by *cashier's check, certified check or money order* made payable to "State of Nevada, Office of the Treasurer," to be received at the Board's Reno office, located at 985 Damonte Ranch Parkway – Suite 206, Reno, NV 89521.

You have the right to appeal this citation by submitting a written request for a hearing to the Board at the Board's Reno office no later than 30 days after receipt of this letter. *See* NRS 639.2895(2).

Please be aware that the forgoing does not preclude a formal investigation 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.

Best regards,

A handwritten signature in blue ink, appearing to read "Brett Kandt".

Brett Kandt
General Counsel
Nevada State Board of Pharmacy

December 20, 2019

To: Nevada State Board of Pharmacy

Re: Citation Unregistered Operation of Pharmacy

We would like to appeal the citation pursuant to NRS 639.2895.

Our background: My name is Tuan Dinh and Michelle Vo, husband and wife, Pharm.D. graduated from Roseman University School of Pharmacy in Henderson class of 2013. In May, we opened our pharmacy, licensed in Arizona on the border of Nevada and Arizona, in Bullhead City. Our delivery service is free of charge and has benefited the low income and disabled populations in the area that don't have transportation. We offer free home delivery out of good hearts in hope to improve patient adherence and health overall. Our delivery service has been a great resource to the local clients, and we are glad we were able to help.

Situation: In the same town, there is another Arizona independent pharmacy that had been delivering to Nevada residents for over 2 years and as we checked with them, they were not aware that they also needed NV license to deliver to Nevada residents neither.

Two months after we opened, there was a disabled patient that had no mean of transportation a dental office had reached out to us for help. We delivered to the client in Nevada for a total of 5 prescriptions at no charge. The pharmacy had made \$12 profit out of the transactions of antibiotics, ibuprofen and alprazolam.

Once we get the notification from the board in August 8th, we immediately stopped delivering to Nevada and applied for the license that got approved on 12/19/2019.

We would like to ask board members to consider waiving the fine since we have complied with the law and got our Nevada Pharmacy license. We would love to continue providing delivery service at no charge to Nevada residents since there is no pharmacy in Laughlin now.

Please do not hesitate to contact us at _____ or _____

Best regards,

Michelle Thu Vo, RPH, Pharm.D.

Tuan Dinh, RPH, Pharm.D