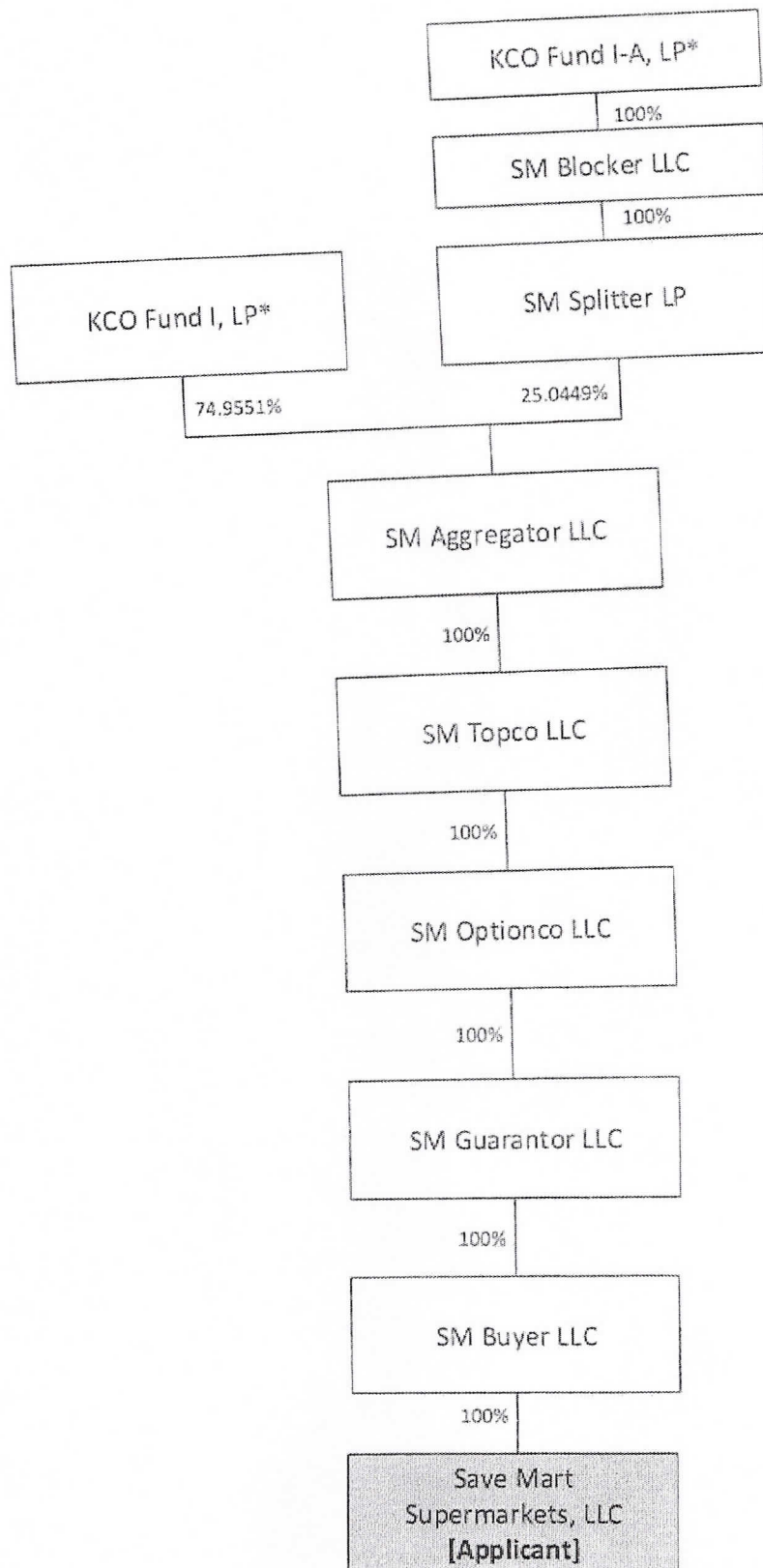


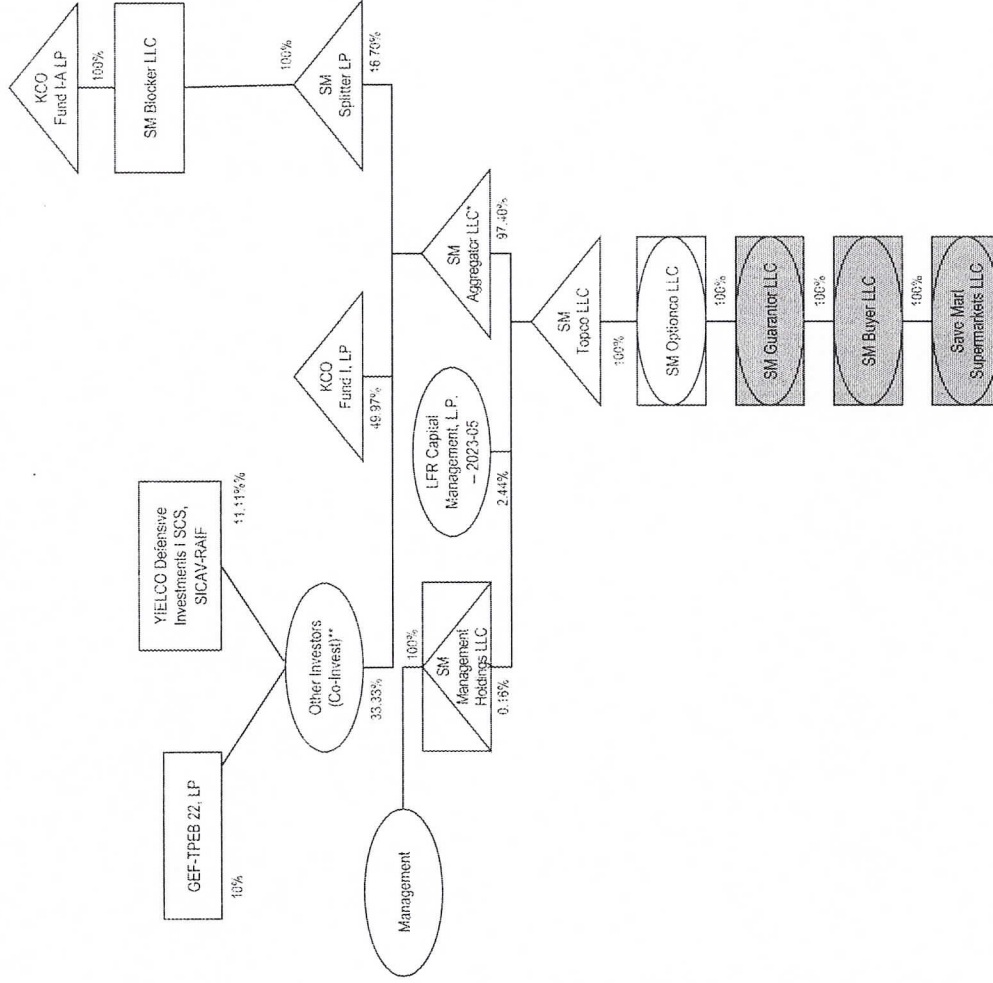
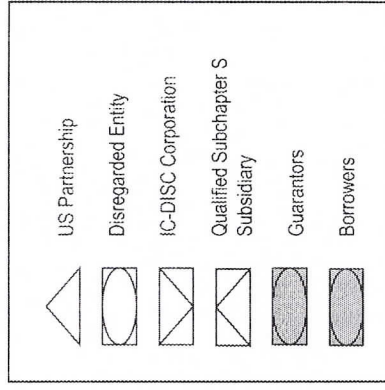
Save Mart Supermarkets
Corporate Structure Post Closing

411-400
CONFIDENTIAL
EXEMPT FROM FREEDOM OF
INFORMATION ACT AND SIMILAR
STATE REQUESTS



* The KCO Funds have no individual owners that directly or indirectly comprise 10% or more of the partnership interest nor do they have power over day to day operations of the Applicant.

Project Sierra Post-Closing Structure



**CONFIDENTIAL/EXEMPT FROM
FREEDOM OF INFORMATION ACT
AND SIMILAR STATE REQUESTS**

* The top level funds above SM Aggregator LLC have no individual owners that beneficially own 10% or more of SM Aggregator LLC, nor do they have power over day to day operations of the Applicant.

** The Other Investors not listed all own less than 10% of SM Aggregator LLC.

SM

BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,

Case No. 21-224-CS-S

Petitioner,

v.

STIPULATION AND ORDER

IDA WASHINGTON, MD,
Certificate of Registration No. CS19355,

Respondent.

J. David Wuest, in his official capacity as Executive Secretary of the Nevada State Board of Pharmacy, and Respondent IDA WASHINGTON, MD, Certificate of Registration No. CS19355, **HEREBY STIPULATE AND AGREE AS FOLLOWS:**

1. The Board has jurisdiction over Respondent and this matter.
2. On or about February 10, 2022, Board Staff properly served Respondent with the Notice of Intended Action and Accusation ("Accusation") on file in this matter together with the Statement to Respondent and Notice of Hearing.
3. Respondent is fully aware of her right to seek the advice of counsel in this matter prior to entering into this Stipulation.
4. Respondent is aware of her right to a hearing on the matters alleged in the Accusation, her right to reconsideration, her right to appeal and any and all other rights which may be accorded to her pursuant to NRS Chapter 233B ("Nevada Administrative Procedure Act"), NRS Chapter 622A ("Administrative Procedure Before Certain Regulatory Bodies"), and NRS Chapter 639 ("Nevada Pharmacy Act").
5. Conditioned on the acceptance of this Stipulation by the Board, and with the exception of the right to challenge any determination that Respondent has failed to comply with the provisions of paragraphs below, Respondent hereby freely and voluntarily waives her rights to a hearing, reconsideration, appeal and any and all other rights related to this action that may be accorded to her by NRS Chapter 233B ("Nevada Administrative Procedure Act"), NRS Chapter 622A

(“Administrative Procedure Before Certain Regulatory Bodies”), and NRS Chapter 639 (“Nevada Pharmacy Act”).

6. Respondent admits that evidence exists, and that Board staff prosecuting this case could present such evidence at an administrative hearing, to establish a factual basis for the violations alleged in the Accusation, *to wit*, that:

A. Respondent failed to timely renew her Certificate of Registration No. CS19355, which expired on October 31, 2018, in violation of NRS 639.210(13); and

B. While Respondent held an expired Nevada Controlled Substance Registration, she wrote three (3) prescriptions for controlled substances for Nevada patients after October 31, 2018, in violation of NRS 453.226(1), NRS 453.236(1), NRS 453.321(1)(a), NRS 639.100(1), NRS 639.2813(1) and/or 21 CFR § 1306.03.

7. Those violations are plead with particularity in the Accusation and are grounds for disciplinary action pursuant to NRS 639.210 and NRS 639.255.

8. In order to resolve this matter without incurring any further costs or the expense associated with a hearing, the Board and Respondent stipulate to the following penalties. Respondent Ida Washington, MD, Certificate of Registration No. CS19355, shall:

A. Pay a fine of Five-Thousand Dollars (\$5000.00) for the alleged violations;

B. Pay Seven-Hundred and Fifty Dollars (\$750.00) to partially reimburse the Board for recoverable attorney’s fees and costs incurred in investigating and prosecuting this matter; and

C. In the event Respondent applies for renewal of her Certificate of Registration No. CS19355, or for any other certificate, license or permit with the Board, he shall appear before the Board to answer questions and give testimony regarding her application, her compliance with this Order, and the facts and circumstances underlying this matter.

9. Any failure by Respondent to comply with the terms of this Order may result in issuance by the Executive Secretary of an order to show cause pursuant to NAC 639.965 directing Respondent to appear before the Board at the next regularly scheduled meeting for a show cause hearing. If such a

hearing results in a finding of a violation of this Order by Respondent, the Board may impose additional discipline upon Respondent not inconsistent with the provisions of NRS Chapter 639.

10. The Board's Assistant General Counsel will present this Stipulation to the Board for approval pursuant to NRS 622.330 at the Board's regularly scheduled public meeting on June 1, 2022, in Las Vegas, Nevada. Respondent will appear at the meeting to answer questions from the Board Members and/or Board Staff. The Board Members and Staff may discuss and deliberate regarding this Stipulation, even if Respondent or her counsel are not present at the meeting.

11. The Board has may accept this Stipulation, but it is not obligated to do so. If this Stipulation is approved by the Board, it shall be a public record pursuant to NRS 622.330 and shall be reported to the National Practitioner Data Bank pursuant to 42 U.S.C. § 1396r-2 and 45 CFR Part 60.

12. If the Board rejects any part or all this Stipulation, and unless they reach an alternative agreement on the record during the hearing, the parties agree that a full hearing on the merits of this matter may be heard by the Board. The terms and admissions herein may not be used or referred to in a full hearing on the merits of this matter.

13. Upon approval of this Stipulation by the Board, Respondent shall pay the \$5,000.00 in agreed upon fines by *cashier's check* or *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," in five (5) equal payments of ONE THOUSAND DOLLARS (\$1,000.00) to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521. The first payment shall be received within thirty (30) days of the effective date of this Order, with each of the four remaining payment installments due in thirty (30) day increments thereafter.

14. Upon approval of this Stipulation by the Board, Respondent shall pay the \$750.00 in agreed upon attorney's fees and costs by *cashier's check* or *certified check* or *money order* made payable to "Nevada State Board of Pharmacy," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order.

15. Subject to the approval of this Stipulation by the Board, the Board and Respondent agree to release each other from any and all additional claims arising from the facts set forth in the Accusation on file herein, whether known or unknown that might otherwise have existed on or before the effective date of this Order.

Respondent has fully considered the charges and allegations contained in the *Notice of Intended Action and Accusation* in this matter, and the terms of this Stipulation, and has freely and voluntarily agreed to the terms set forth herein, and waived certain rights, as stated herein.

AGREED:

Signed this 7 day of April 2022.

Signed this 7th day of April 2022.

Ida Washington, MD
IDA WASHINGTON, MD
Certificate of Registration No. CS19355

Peter K. Keegan
PETER K. KEEGAN, ESQ.
Assistant General Counsel
Nevada State Board of Pharmacy

DECISION AND ORDER

The Nevada State Board of Pharmacy hereby adopts the foregoing Stipulation as its decision as to Respondent Ida Washinton, MD, Certificate of Registration No. CS19355, in Case No. 21-224-CS-S and hereby orders that the terms of the foregoing Stipulation be made effective upon execution below.

IT IS SO ORDERED.

Entered this ____ day of June 2022.

Helen Park, President
Nevada State Board of Pharmacy

BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,

Petitioner,

v.

GEORGE M. DOCKENDORF, DO,
Certificate of Registration No. CS20768,

Respondent.

Case No. 21-216-CS-S

STIPULATION AND ORDER

J. David Wuest, in his official capacity as Executive Secretary of the Nevada State Board of Pharmacy, and Respondent GEORGE DOCKENDORF, DO, ("Respondent") Certificate of Registration No. CS20768, by and through his undersigned counsel, **HEREBY STIPULATE AND AGREE AS FOLLOWS:**

1. The Board has jurisdiction over Respondent and this matter.
2. On or about January 28, 2022, and again on or about March 8, 2022, Board Staff properly served Respondent with the Notice of Intended Action and Accusation ("Accusation") on file in this matter together with the Statement to Respondent and Notice of Hearing.
3. Respondent is fully aware of his right and has sought the advice of counsel in this matter prior to entering into this Stipulation. Respondent's counsel of record in this matter is James D. Boyle, Esq. of the law firm Holley Driggs Ltd., 400 South Fourth Street, Suite 300, Las Vegas, Nevada 89101, (702) 791-0308.
4. Respondent is aware of his right to a hearing on the matters alleged in the Accusation, his right to reconsideration, his right to appeal, and any and all other rights which may be accorded to him pursuant to NRS Chapter 233B ("Nevada Administrative Procedure Act"), NRS Chapter 453 ("Nevada Uniform Controlled Substances Act"), NRS Chapter 622A ("Administrative Procedure Before Certain Regulatory Bodies"), and NRS Chapter 639 ("Nevada Pharmacy Act").
5. Conditioned on the acceptance of this Stipulation by the Board, and with the exception of the right to challenge any determination that Respondent has failed to comply with the provisions of

the paragraphs set forth below, Respondent hereby freely and voluntarily waives his rights to a hearing, reconsideration, appeal and any and all other rights related to this action that may be accorded to him by NRS Chapter 233B ("Nevada Administrative Procedure Act"), NRS Chapter 453 ("Nevada Uniform Controlled Substances Act"), NRS Chapter 622A ("Administrative Procedure Before Certain Regulatory Bodies"), and NRS Chapter 639 ("Nevada Pharmacy Act").

6. Respondent admits that evidence exists, and that Board staff prosecuting this case could present such evidence at an administrative hearing, to establish a factual basis for the violations alleged in the Accusation, *to wit*, that:

A. Respondent failed to timely renew his Certificate of Registration No. CS20768, which expired on October 31, 2018, in violation of NRS 639.210(13), and

B. While Respondent held an expired Nevada Controlled Substance Registration, he mistakenly wrote one (1) prescription for a controlled substance for a Nevada patient after October 31, 2018, in violation of NRS 453.226(1), NRS 453.321(1)(a), NRS 639.100(1), and/or NRS 639.2813(1).

7. The violations set forth in Paragraph 6(B) are plead with particularity in the Accusation and are grounds for disciplinary action pursuant to NRS 639.210(13) and NRS 639.255(f).

8. In order to resolve this matter without incurring any further costs or the expense associated with a hearing, the Board and Respondent hereby stipulate to the following remedies. Respondent George Dockendorf, DO, Certificate of Registration No. CS20768, shall:

A. Pay a fine of Five-Thousand Dollars (\$5000.00) to the State of Nevada for the above-referenced violations;

B. Pay attorneys' fees and costs of Seven-Hundred and Fifty Dollars (\$750.00) to the Nevada State Board of Pharmacy, to partially reimburse the Board for recoverable attorney's fees and costs incurred in investigating and prosecuting this matter; and

C. In the event Respondent applies for renewal of his Certificate of Registration No. CS20768, or for any other certificate, license or permit, with the Board, he shall appear before the

Board to answer questions and give testimony regarding his application, his compliance with this Order, and the facts and circumstances underlying this matter.

9. Any failure by Respondent to comply with the terms of this Order may result in issuance by the Executive Secretary of an order to show cause pursuant to NAC 639.965 directing Respondent to appear before the Board at the next regularly scheduled meeting for a show cause hearing. If such a hearing results in a finding of a violation of this Order by Respondent, the Board may impose additional discipline upon Respondent not inconsistent with the provisions of NRS Chapter 639.

10. The Board's Assistant General Counsel will present this Stipulation to the Board for approval pursuant to NRS 622.330 at the Board's regularly scheduled public meeting on April 13, 2022, in Las Vegas, Nevada. Respondent will appear at the meeting to answer questions from the Board Members and/or Board Staff. The Board Members and Staff may discuss and deliberate regarding this Stipulation, even if Respondent or his counsel are not present at the meeting.

11. The Board may accept this Stipulation, but it is not obligated to do so. If this Stipulation is approved by the Board, it shall be a public record pursuant to NRS 622.330 and shall be reported to the National Practitioner Data Bank pursuant to 42 U.S.C. § 1396r-2 and 45 CFR Part 60.

12. If the Board rejects any part or all this Stipulation, and unless the Board reaches an alternative agreement on the record during the hearing, the parties agree that a full hearing on the merits of this matter may be heard by the Board. The terms and admissions herein may not be used or referred to in a full hearing on the merits of this matter.

13. Upon approval of this Stipulation by the Board, Respondent shall pay the \$5,000.00 in agreed upon fine by *cashier's check* or *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order.

14. Upon approval of this Stipulation by the Board, Respondent shall pay the \$750.00 in agreed upon attorney's fees and costs by *cashier's check* or *certified check* or *money order* made payable to "Nevada State Board of Pharmacy," to be received by the Board's Reno office located at

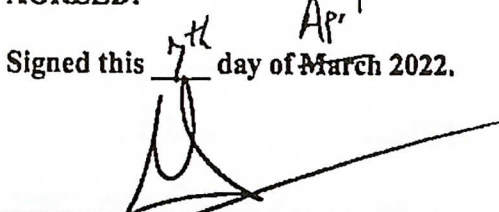
985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order.

15. Subject to the approval of this Stipulation by the Board, the Board and Respondent agree to release each other from any and all additional claims arising from the facts set forth in the Accusation on file herein, whether known or unknown that might otherwise have existed on or before the effective date of this Order.

Respondent has fully considered the charges and allegations contained in the *Notice of Intended Action and Accusation* in this matter, and the terms of this Stipulation, and has freely and voluntarily agreed to the terms set forth herein, and waived certain rights, as stated herein.

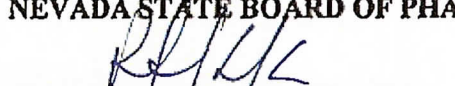
AGREED:

Signed this 7th day of April 2022.


GEORGE DOCKENDORF, MD *Do*
Certificate of Registration No. CS20768

Signed this 7th day of April 2022.

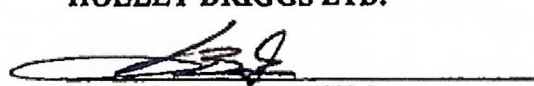
NEVADA STATE BOARD OF PHARMACY


PETER K. KEEGAN, ESQ.
Assistant General Counsel
985 Damonte Ranch Pkwy., Ste. 206
Reno, Nevada 89502
775-850-1440

APPROVED AS TO FORM
AND CONTENT this 7th day of
~~March~~ 2022.

April

HOLLEY DRIGGS LTD.


JAMES D. BOYLE, ESQ.
400 S. 4th Street, Ste. 300
Las Vegas, Nevada 89101
702-791-0308
Counsel For George Dockendorf, MD

DECISION AND ORDER

The Nevada State Board of Pharmacy hereby adopts the foregoing Stipulation as its decision as to Respondent George Dockendorf, DO, Certificate of Registration No. CS20768, in Case No. 21-216-CS-S and hereby orders that the terms of the foregoing Stipulation be made effective upon execution below.

IT IS SO ORDERED.

Entered this ____ day of April 2022.

Helen Park, President
Nevada State Board of Pharmacy

BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,

Petitioner,

v.

**PAUL A. HOWSE, RPH
Certificate of Registration No.
18406,**

**JUSTINE STANEVICH,
Certificate of Registration No.
PT18958,**

Respondents.

**CASE NOS. 20-135-RPH-S
20-135-PT-S**

**STIPULATION AND ORDER FOR
CASE NO. 20-135-RPH-S
*PAUL H. HOWSE, RPH Only***

Peter Keegan, Assistant General Counsel for Petitioner the Nevada State Board of Pharmacy ("Board"), Respondent Paul A. Howse ("Howse"), Certificate of Registration No. 18406, through his counsel, Lyn Beggs, Esq., **HEREBY STIPULATE AND AGREE THAT:**

1. The Board has jurisdiction over Respondents and this matter.
2. On or about January 28, 2022, Board Staff properly served Howse with the Notice of Intended Action and Accusation ("Accusation") on file in this matter together with the Statement to Respondent and Notice of Hearing.
3. On or about February 17, 2022, Howse filed an Answer and Notice of Defense to the Accusation.
4. Howse is fully aware of his right to seek the advice of counsel in this matter and have obtained the advice of counsel prior to entering into this Stipulation.
5. Howse is aware of his right to a hearing on the matters alleged in the Accusation, his right to reconsideration, his right to appeal and any and all other rights which may be accorded to him pursuant to NRS Chapter 233B ("Nevada Administrative Procedure Act"), NRS Chapter

622A ("Administrative Procedure Before Certain Regulatory Bodies"), and NRS Chapter 639 ("Nevada Pharmacy Act").

6. Conditioned on the acceptance of this Stipulation by the Board, and with the exception of the right to challenge any determination that Howse failed to comply with the provisions below, Howse hereby freely and voluntarily waives his right to a hearing, reconsideration, appeal, and any and all other rights related to this action that may be accorded to him by NRS Chapter 233B ("Nevada Administrative Procedure Act"), NRS Chapter 622A ("Administrative Procedure Before Certain Regulatory Bodies"), and NRS Chapter 639 ("Nevada Pharmacy Act").

7. Howse admits that evidence exists, and that Board staff prosecuting this case could present such evidence at an administrative hearing to establish a factual basis for the violations alleged therein, *to wit*, that:

A. Howse engaged in unprofessional conduct as defined in NAC 639.945(1)(i) when he walked away from his computer and failed to log out to prevent unlawful access to the Prescription Monitoring Program ("PMP") and is therefore subject to discipline pursuant to NRS 639.210(4) and/or NRS 639.255.

8. The above cited violations of law are plead with particularity in the Accusation and are grounds for action pursuant to NRS 639.210 and NRS 639.255.

9. Based upon the Accusation and the foregoing admissions, the Board and Howse stipulate to the below listed discipline. Respondent Paul H. Howse, Certificate of Registration No. 18406, shall:

A. Pay a fine of One Thousand Dollars (\$1,000.00) for the violations; and

B. Pay Five Hundred Dollars (\$500.00) to partially reimburse the Board for recoverable attorney's fees and costs incurred in investigating and prosecuting this matter.

10. Any failure by any Howse to comply with the terms of this Order may result in issuance by the Executive Secretary of an order to show cause pursuant to NAC 639.965 directing that Howse appear before the Board at the next regularly scheduled meeting for a show cause

hearing. If such a hearing results in a finding of a violation of this Order, the Board may impose additional discipline upon that Howse not inconsistent with the provisions of NRS Chapter 639.

11. The Board's Assistant General Counsel will present this Stipulation to the Board for approval pursuant to NRS 622.330 at the Board's regularly scheduled public meeting on April 13, 2022. Howse and his authorized representative(s) will appear at the meeting to answer questions from the Board Members and/or Board Staff. The Board Members and Staff may discuss and deliberate regarding this Stipulation, even if Howse or his counsel are not present at the meeting.

12. The Board has discretion to accept this Stipulation, but it is not obligated to do so. If this Stipulation is approved by the Board, it shall be a public record pursuant to NRS 622.330 and shall be reported to the National Practitioner Data Bank pursuant to 42 U.S.C. § 1396r-2 and 45 CFR Part 60.

13. If the Board rejects any part or all of this Stipulation, and unless they reach an alternative agreement on the record during the hearing, the parties agree that a full hearing on the merits of this matter may be heard by the Board. The terms and admissions herein may not be used or referred to in a full hearing on the merits of this matter.

14. Upon approval of this Stipulation by the Board, Howse shall pay the fines agreed to herein by *cashier's check* or *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order.

15. Upon approval of this Stipulation by the Board, Howse shall pay the attorney's fees and costs agreed to herein by *cashier's check* or *certified check* or *money order* made payable to "Nevada State Board of Pharmacy," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order.

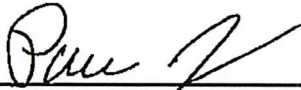
16. Subject to the approval of this Stipulation by the Board, the Board and Howse and each of them, agree to release each other from any and all additional claims arising from the facts

set forth in the Accusation on file herein, whether known or unknown that might otherwise have existed on or before the effective date of this Order.

Respondent has fully considered the charges and allegations contained in the *Notice of Intended Action and Accusation* in this matter, and the terms of this Stipulation, and have freely and voluntarily agreed to the terms set forth herein, and waived certain rights, as stated herein.

AGREED:

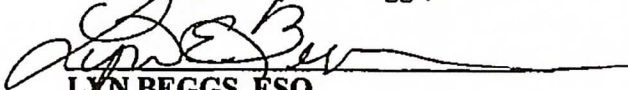
Signed this 15th day of April 2022.



PAUL A. HOWSE, RPH
Certificate of Registration No. 18406

APPROVED AS TO FORM
AND CONTENT this 5th day of
April 2022.


Law Offices of Lyn E. Beggs, PLLC



LYN BEGGS, ESQ.
Counsel For Paul A. Howse, RPH.

Signed this 5th day of April 2022.

NEVADA STATE BOARD OF PHARMACY



PETER K. KEEGAN, ESQ.
Assistant General Counsel
985 Damonte Ranch Pkwy., Ste. 206
Reno, Nevada 89502
775-850-1440

DECISION AND ORDER

The Nevada State Board of Pharmacy hereby adopts the foregoing Stipulation as its decision as to Respondent Paul A. Howse, RPH, Certificate of Registration No. 18406, in Case No. 20-135-RPH-S and hereby orders that the terms of the foregoing Stipulation be made effective upon execution below.

IT IS SO ORDERED.

Entered this ____ day of April 2022.

Helen Park, President
Nevada State Board of Pharmacy

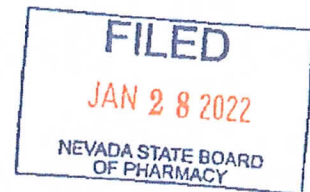
EXHIBIT 1

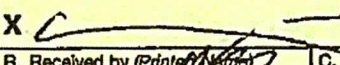
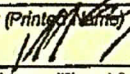
Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

Justine Stanevich, PT
Mandalay Springs Dr. Apt.
Las Vegas, NV 89120
20-135-PT-S

9171 9690 0935 0265 1324 06



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">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.		<p>A. Signature X  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
1. Article Addressed to: Justine Stanevich, PT Mandalay Springs Dr. Apt. Las Vegas, NV 89120		B. Received by (Printed Name) 	C. Date of Delivery 1-27-22
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Art		3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
9171 9690 0935 0265 1324 06		Delivery	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

Case No. 20-135-PT-S - 001

USPS Tracking®

[FAQs >](#)[Track Another Package +](#)**Tracking Number: 9171969009350265132406**[Remove X](#)

Your item has been delivered to an agent for final delivery in LAS VEGAS, NV 89120 on January 31, 2022 at 11:13 am.

USPS Tracking Plus™ Available 

Delivered to Agent for Final Delivery

January 31, 2022 at 11:13 am
LAS VEGAS, NV 89120

[Feedback](#)**Get Updates** 

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Tracking History

USPS Tracking Plus™

Product Information

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Answer Due 2/20/22

EXHIBIT 2

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT



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

February 1, 2022

Justine Stanevich

██████ Mandalay Springs Dr. Apt ██████

Las Vegas, NV 89120

Re: Justine Stanevich Case No. 20-135-PT-S

Dear Justine Stanevich:

The hearing for case number **20-135-PT-S** has been scheduled for Wednesday, March 2, 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

9171 9690 0935 0265 1325 36

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.

Case No. 20-135-PT-S - 003

Track Another Package +

Tracking Number: 9171969009350265132536

Remove X

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USPS Tracking Plus™ Available ▾

 **Delivered to Agent for Final Delivery**

February 3, 2022 at 10:13 am
LAS VEGAS, NV 89120

Feedback

Get Updates ▾

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USPS Tracking Plus™	▾
Product Information	▾

See Less ^

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.

1. Article Addressed to:

Justine Stanevich
 Mandalay Springs Dr. Apt
 Las Vegas, NV 89120

2. Article Number (Transfer from service label)

9171 9690 0935 0265 1325 36

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

Yes ☐ No ☐

- | | |
|--|---|
| 3. Service Type | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Registered Mail |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input checked="" type="checkbox"/> Certified Mail® | <input checked="" type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery | |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |

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

Domestic Return Receipt

Case 2:20-cv-01135-PT-S - 005

Case No. 201

USPS TRACKING#



5590 9402 6596 1028 2352 09

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Nevada State Board of Pharmacy
985 Damonte Ranch Parkway Suite 206
Reno, Nevada 89521
Return Service Requested

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

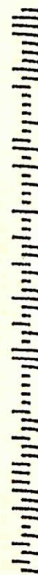


EXHIBIT 3

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

Your Information

Type :

☒ Individual ☐ Company

First Name:

F [REDACTED]

Middle Name:

Last Name:

S [REDACTED]

License Type:

-- Select -- ▼

License Number:

Address and Contacts:

Street Line 1:

[REDACTED] Amethyst Stars Ave

Street Line 2:

City:

Las Vegas

State:

Nevada ▼

Zip:

89031

Contact Phone:

[REDACTED]

Email:

joe@email.com

Alt Phone:

() -

Licensee

Type :

☐ Individual ☒ Company

Case No. 20-135-PT-S - 007

Business Name:

Smiths #351

Contact Name:**License Type:**

-- Select --

License Number:**Address and Contacts:****Street Line 1:**

6130 W Tropicana Ave

Street Line 2:**City:**

Las Vegas

State:

Nevada

Zip:

89103

Phone:

() -

Email:

joe@email.com

Complaint

Incident Date:

05/06/2020

Received Date:

05/27/2020

Statement of Complaint:

See attached.

Case No. 20-135-PT-S - 008

Related Documents

Drop file(s) here to upload or click here to browse and select file(s) to upload.

Type	Name	Actions
Complaint Document ▼		<input type="checkbox"/>

Reset



Complaint Form

Date: May 06, 2020

Complainant Name: F [REDACTED] S [REDACTED]

Address: [REDACTED] Amethyst Stars Avenue City, State, Zip: Las Vegas, NV. 89031

Telephone Numbers: Home [REDACTED] Business N/A

Patient Name: F [REDACTED] S [REDACTED] Date of Birth: [REDACTED]

Physician Name: Telephone Number:

Address: City, State, Zip:

Drug Prescribed: Prescription Number:

Pharmacy Name & Address: Smith's Pharmacy #351 6130 W. Tropicana Avenue., Las Vegas, NV. 89103

Pharmacist/Staff: Justine Stanevich D.O.B. [REDACTED]

STATEMENT OF COMPLAINT: Type or neatly print your complaint below. Be as concise as possible. Use reverse side if necessary. Make copies and attach any documents you have which support your allegation(s). After completing your statement of complaint, please sign and date it. **The Board does not have jurisdiction over complaints involving rudeness, customer service and/or pricing/billing disputes.**

To Whom it may concerns:

I would like to file a complaint on a pharmacy technician that was employed at Smith's Pharmacy in Nevada. Her name is Justine Colette Stanevich D.O.B. [REDACTED]. I have been harassed by this individual for going on 8ys. I was informed by a mutual friend in February 2020 that Justine had been terminated from her position at Smith's Pharmacy because she had accessed my narcotic prescription using someone else's access at work. I few weeks later I receive this letter from Smith's (Please see attached). She is now currently working at Walgreen's Pharmacy. This individual has abused the authority that has been granted to her as a pharmacist. I would like action to be taken and her license to be revoked. I will be filing a complaint with the Office of Civil Rights as well as The Attorney Generals office. Please have someone reach out to me regarding my complaint to the information listed above.

Thank you,

F [REDACTED] S [REDACTED]

Patricia Stanevich
May. 06, 2020

Please understand that by signing and submitting this form to the Board of Pharmacy, you are authorizing and allowing this Board's staff to access your medical history and records, including pharmacy records, as needed to investigate your complaint. If you would like to limit what the Board's staff can review, you must inform us of those limitations in writing.

Posted 11/3/2009

Case No. 20-135-PT-S - 010



MARCH 2, 2020

██████████
██████████ AMETHYST STARS AVENUE
NORTH LAS VEGAS, NEVADA 89031

Dear Patricia,

We regret to inform you that one of our pharmacy technicians improperly accessed your controlled substance prescription records. This incident occurred at our Smith's Pharmacy #351, located at 6130 W. Tropicana Avenue Las Vegas, Nevada 89103. According to our Company's Pharmacy Privacy Policies and Procedures, this constituted a breach of your protected health information, and we wanted to make you aware of this unfortunate incident.

The incident occurred on 2/12/2020 and was discovered on 2/12/2020. The protected information that the technician had access to included: your name, address, date of birth, phone number, controlled substance prescription numbers, medication names, strength, directions, physician name.

Upon learning of this incident, we performed an investigation with the pharmacy involved. We enforced disciplinary action against the employee. We believe this to be an isolated incident. The entire pharmacy staff had been trained on, and is re-trained every year on, the Company's Pharmacy Privacy Policies and Procedures associated with safeguarding patient information as defined in the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations (HIPAA).

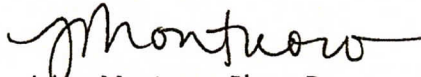
Please be aware that no financial information was included in the information disclosed and as mentioned above all information was subsequently returned to the pharmacy. Nevertheless, if you desire to do so, you may take precautionary steps to protect yourself from potential harm that may result from this incident. To learn additional information on consumer protection when personal information is compromised please visit the following websites:

- *AHIMA's Medical Identity Theft Response Checklist for Consumers:*
http://www.myphr.com/index.php/privacy_and_phrs/avoiding_medical_identity_theft/medical_identity_theft_response_checklist/
- *Privacy Rights Clearing House*
<http://www.privacyrights.org/>
- *US Dept. of Health and Human Services*
<http://www.hhs.gov/>

In addition, you do have the option to file a HIPAA complaint with the Office for Civil Rights (OCR) at <http://www.hhs.gov/ocr/civilrights/complaints/>.

Please be assured that we take these matters very seriously. We regret any concern or inconvenience that may have resulted from this incident. Your privacy is very important to us and we will continue to do everything we can to avoid any further incidents. Should you have any further questions or concerns, please do not hesitate to contact me directly.

Sincerely,



Jaime Montuoro, PharmD

Health & Wellness Merchandiser

Smith's Food & Drug

801-974-1476

SMITH'S FOOD AND DRUG CENTERS, INC.
1550 SOUTH REDWOOD ROAD, SALT LAKE CITY, UT 84104
PHONE: 801-974-1400

Case No. 20-135-PT-S - 012

EXHIBIT 4

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

Nevada State Board of Pharmacy Case #20-135 Response

Attention: Dena McClish

On February 12th, 2020 at 5:24 pm technician Justine Stanevich approached me at my workstation with an opioid prescription for a new patient to our pharmacy. This was standard procedure to allow the pharmacist to run a PMP and assess if we needed to obtain more information from the prescriber before filling a new opioid. I proceeded to review the PMP utilizing a built-in tool we have in our pharmacy system (Easyfill PRN) and determined I needed to inform the patient we would need to contact the prescriber for more information. I went to the drop off window to discuss this with the patient and Ms. Stanevich stayed at the back counter of the pharmacy next to my terminal to allow me to do this. After a brief conversation at drop off window I returned to my workstation and immediately noticed a second PMP window was opened for a Patricia Sanchez who I hadn't checked the PMP for. I proceeded to ask Ms. Stanevich if she ran this PMP under my name by utilizing the PMP button in EPRN pharmacist have access too and she admitted that she had indeed looked up Ms. Sanchez's PMP history. I asked her if this was another patient dropping off controlled substance prescriptions and she stated no it was someone known to her and that they didn't fill at our pharmacy. I informed her that this was clearly unacceptable, a clear violation of company policy and a breach of HIPPA.

I immediately reported the incident to my district and division managers for Smith Food & Drug. Ms. Stanevich was put on immediate suspension while we reviewed video tape of my workstation for this time frame and collected statements from everyone working in the pharmacy at the time. After this review it was determined Ms. Stanevich violated company HIPPA Privacy Policies and Procedures and we terminated employment with Ms. Stanevich effective 02/18/2020.

To prevent an incident like this from reoccurring I have changed how I practice within the pharmacy. If I walk away from my station for any reason or period of time the terminal is immediately signed off to prevent any other pharmacy staff from unauthorized access to PMP information.

Paul Howse 8/26/2020

Paul Howse PharmD.
Pharmacy Manager
Smith's Food and Drug Store #351
6130 W. Tropicana Ave.
Las Vegas, NV 89103
P: 702-871-6550
F: 702-253-7633

I Elysse Myles returned from lunch on 2/12/20 and was told by Justine S. that she was in trouble for doing something she was not suppose to do. Justine then proceeded to tell me that she ran a PDMP on someone who is not a current patient. Before she can go into details our pharmacist Paul walked towards us and the conversation ended.

Elysse Myles

E. Myles 2.13.20

EXHIBIT 5

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

I was in the filling station when patient came in with rx that required Paul to do a pmp. After checking his pmp Paul went to drop off to speak with patient. Justine was at his computer doing something. Not sure what she was doing I was busy filling. When Paul got back to his computer he asks her what she was doing on it. She replied doing a pmp on her family member.

Wiam Phimmasan



Smith's Food and Drug Stores
Employee Written Warning Notice

	Name:	Emp. No.	Position:
Issued To:	Justine Stanevich	JS44422	RX Tech
Manager:	Stephanie Ermi	SE88045	Assistant Store Manager
Date:	2/18/2020	Number of Similar Warnings:	0

WARNING NOTICE

You are hereby notified that your employment performance is unsatisfactory in the following respects. Improvement must be made for you to continue your employment with Smith's Food and Drug Stores.

REASON FOR WARNING

Violation of Policy- On 2/12/20, you violated the HIPPA Privacy policies and procedures in the pharmacy department.

EMPLOYEE EXPECTATIONS

It is the employees expectation to follow all policies outlined in the employee handbook, standard operating guidelines and that of the company. You are being terminated, effective immediately.

EMPLOYEE REMARKS

Refusal to sign

It is our sincere desire that your performance attain a satisfactory level so no further action will be necessary.

Manager
Signature:

Stephanie Ermi

Date:

2/18/20

Employee
Signature:

X

Date:

2/18/20

Dan Della

COPIES: 1 - Employee / 1 - Employee's File / 1 - Send to Payroll

2/18/20.

Case No. 20-135-PT-S - 016

EXHIBIT 6

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

From Justice Stenewich 2 Date Today 9:12

I am writing this letter as a formal response to the investigation by my pharmacy technician associate. In mid February of 2020 I made a very poor choice, for which I am deeply regretful. I had lapse in judgement and looked up a person I knew personal medical information. It was common practice for me to enter in a patients information into the pharmacists computer and wait for him to review the information to determine if we could accept taking on a new patient. On this day I did just that, and when the pharmacist went over to help the patients at the window we would not accept them, I entered in Mr. Sanchez's information. I viewed the screen no more than 10 seconds and waited my return to my normal duties. I did not close the screen or try to hide what I did. When the pharmacist returned to his computer he asked who the patient on his screen was, I replied it was someone I knew. He told me he had to report this information and I was subsequently terminated from my position at Smith's. I did this with no intention of malice, fraud or any other intent to cause harm. I did not gain any information that I wasn't already aware of. My poor choice 2 actions were out of stupidity and boredom, nothing more. I take pride in my job and the medical oath that I took. I know what I have done was wrong, but I was unaware of the level of self deprecation I would face. I wish I could rewind time and make better decisions but all I can do is reflect and grow from this situation. I have lost a job that I truly loved, both within the company I worked for and its employees. I have lost a position for which I felt short of a mark or being better than it. I have failed to act on the morals and standards to which I am raising my daughter. And although she is too young to understand that, I know and note myself accountable. Proverbs 28:13 states "He who covers his sins will not prosper, but whoever confesses and forsakes them will have mercy". I have from the beginning been open and honest about my mistake. When interviewing for my current position I was asked what is the biggest lesson I learned from my previous job. My response was in reference to this particular situation. Although I was not obligated to disclose this information, and most employers would frown upon this and do not, we need to hold ourselves accountable for every decision we make. No matter how small it may seem. I have learned many lessons from all of this and am grateful for those but I will always have a deep and personal regret from this situation as it has caused complications in my personal life. It will be my profession, I ask that the board view me with mercy and grace and do not remove my title from me. I have included in this response professional letters of character from my supervisors. If you have any further questions or need any other information please feel free to reach me at the phone number and address listed below. Thank you for your time.

Justin Stanevich 9/22/2020

Case # 20-135

Attn: Dena Mc Clish

EXHIBIT 7

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

Justine Stanevich

From: 04856 31 On: Today 16:52

□□□□□

To Whom it may concern

I interviewed and hired Justine at my store #4856, 3400 Boulder Highway in Las Vegas NV. In the interview I asked why she was looking for a new job? why leave Smiths pharmacy? She didn't make any excuses and to me she had an incident at Smiths but it wasn't reported to the Board, still it ended employment with Smiths. The way it was described seemed like an error in judgment and I believe the remorse that was conveyed. She understands the impact that it took on her career and I thought truly regretted the decision. After my interview she was interviewed at another Walgreens location and they also offered her a spot, so I don't think I was alone in my assessment. She was open and honest and not attempting to conceal or hide the fact of an incident.

Alan Wernet

Store Manager 4856

3400 Boulder Hwy, Las Vegas, Nevada, 89166

702-432-5940

Tiffany Taylor, PharmD
[REDACTED] Fanano Rd
Henderson, NV 89044
[REDACTED]

Tiffany.Taylor@ [REDACTED]

September 18, 2020

Nevada Board of Pharmacy
985 Damonte Ranch Pkwy #206
Reno, NV 89521

Dear Members of the Board,

I have worked with Justine Stanevich during her employment with Smith's Pharmacy routinely over the last 2 years. We have worked as a team in the multiple facets of the pharmacy, starting at dispensing medication but progressing even up to creating open conversations with patients to optimize their health outcomes. Our work relationship created a kinship that followed despite eventually working at different pharmacies.

Justine is thorough, hard-working, considerate, and passionate about her role as a pharmacy technician. Her desire to help in any situation, even when the outcome may require long and tedious tasks, makes her a valuable asset to the pharmacy community. She truly recognizes that there is an individual person at the end of every bottle dispensed.

Her warm and welcoming personality made the initial transition of working at a new location comfortable. Justine's personality makes you feel like you are family. She is understanding, non-judgmental, and overall genuinely cares about the people around her.

I know Justine is an asset any pharmacy at which she works and a light to the people that she meets.

Please contact me with any further comments or questions.

Sincerely,

Tiffany Taylor, PharmD

Kristin Flora, RPh
[REDACTED] Homesteader Ct
Henderson, NV 89052
[REDACTED]

Nevada State Board of Pharmacy
985 Damonte Ranch Pkwy, Ste 206
Reno, NV 89521
Office: (775) 850-1440
Email: pharmacy@pharmacy.nv.gov

September 11, 2020

To Whom It May Concern:

Asking me to write a character letter for Justine Stanevich was an easy choice to make. Justine has always presented herself in a professional and helpful manner every time I had worked with her. The following is just a few words to express my opinions on the content of Justine's character and work ethics.

I have known Justine since 2017 when I met her at Smith's store 351 on the corner of Tropicana and Jones. I am a floater pharmacist with Smith's and I see all kinds of technicians and interns every day. Some are good and some not so good. What stood out with Justine was her customer service. She was willing to go over and above to take care of every patient. She never judged or got frustrated with people but instead took time to listen and solve any problems or issues. Her willingness to step up was extremely helpful to me as a floater who did not know any of the customers, but she never went above her level instead relying on the pharmacist.

Justine is highly active with her spirituality by attending New Journey Church. Her faith is a testament to her compassion and empathy when dealing with patients. She brings this to light in her raising her daughter and stepchildren along with a few grandchildren. Justine has a gift for juggling her home and work life and knows what is appropriate to bring to work versus home.

Justine also knows that she made a mistake. When I asked her what happened the first thing she said was that she "lost her job because she was nosey". She said that she knew better and was terribly sorry and embarrassed for what she did. It takes a great person to admit that they were wrong and to take responsibility for her actions.

I highly recommend that Justine keep her Nevada Technician License and continue to help pharmacists and patients. Please do not hesitate to contact me with any questions.

Sincerely,
Kristin Flora, RPh

EXHIBIT 8

Case No. 20-135-PT-S

JUSTINE STANEVICH, PT

TOTAL TIME SUMMARY

Case No. 20-135-PT-S – JUSTINE STANEVICH

Investigator Dena McClish – 6.5 hours @\$43.00/hr =	\$279.50
Attorney Courtney K. Lee – 3.75 hours @\$56.00/hr=	\$210.00
Attorney Peter Keegan – 4.25 hours @\$55.00/hr =	\$233.75
Board Coordinator Kristopher Mangosing – 1.0 hours @31.86/hr =	\$31.86
Board Coordinator Shirley Hunting – 1.0 hours @\$38.77/hr=	\$38.77
<hr/>	
Total	\$793.88

Timesheet for Dena McClish

20-135 PT STANEVICH

DATE	TIME
8/17/20- initial assign & review of case	.5
8/19/20 – pmp search pull	.5
8/20/20 – cmpnt contact, PMP pull, accuse letter	1.75
8/31/20 – recvd corp & cvs response, review	1
9/1/20—cmlnt contact	.25
09/23/20- recvcd & review PT response	.75
9/29/20 -ROI	1.5
11/09/29 -Complainant contact	.25

TOTAL 6.5 hours x \$43/hour = \$279.50

Timesheet for Courtney K. Lee, Esq.
Nevada State Board of Pharmacy v. Howse/Stanevich –
Case No. 20-135

DATE	TIME	DESCRIPTION
10/18/2021	2.5	Drafted accusation and forwarded to Reno for review
1/27/2022	0.5	Revised accusation
3/10/2022	0.5	Receipt and review of emails, letter of representation, and answer from Lyn Beggs, Esq. on behalf of Respondent Howse
3/10/2022	0.25	Email to Peter Keegan, Esq. transferring case, re: unavailable for April Board meeting
TOTAL	3.75	3.75 hours x \$56 rate per hour = \$210.00

Timesheet for Shirley Hunting –

STANEVICH, JUSTINE, Certificate of Registration No. PT18958 - Case No. 20-135-PT-S

DATE

TIME

Date	Hours	Activity
01/28/2022	1	Prepared Accusation for filing/mailing.

Total Hours

Rate 38.77

Total Costs 38.77

Timesheet for Kristopher Mangosing –

JUSTINE STANEVICH - CASE NO. 20-135-PT-S

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

3/15/2022	0.50
-----------	------

Prepared/ Mailed 21 day notice

3/29/2022	0.50
-----------	------

Prepared Board meeting material

TOTAL 1.00 hours x \$31.86/hour = \$31.86

Timesheet for Shirley Hunting –

STANEVICH, JUSTINE, Certificate of Registration No. PT18958 - Case No. 20-135-PT-S

DATE

TIME

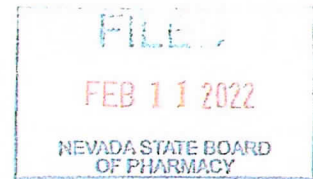
Date	Hours	Activity
01/28/2022	1	Prepared Accusation for filing/mailing.

Total Hours

Rate 38.77

Total Costs 38.77

Abdel M. Khalek, MD
8600 Starboard Ave.
Las Vegas, NV 89117
NIAA 22-019-N



9171 9690 0935 0271 8690 20

Delivered 3-7-22



Abdel M. Khalek, MD
320 N. Nellis Blvd., Ste. 6
Las Vegas, NV 89110
NIAA 22-019-N

9171 9690 0935 0271 8690 06

Delivered 2-25-22

Abdel M. Khalek, MD
5375 S. Fort Apache Road Unit 102
Las Vegas, NV 89148
NIAA 22-019-N

9171 9690 0935 0271 8690 13

Undeliverable

Track Another Package +

Tracking Number: 9171969009350271869006

Remove X

Your item was delivered to an individual at the address at 3:43 pm on February 25, 2022 in LAS VEGAS, NV 89110.

USPS Tracking Plus® Available ∨

✓ Delivered, Left with Individual

February 25, 2022 at 3:43 pm
LAS VEGAS, NV 89110

Feedback

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none">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.	<p>A. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
1. Article Addressed to: Abdel M. Khalek, MD 320 N. Nellis Blvd., Ste. 6 Las Vegas, NV 89110	<p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input checked="" type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Collect on Delivery</p>
2. Article Number 9171 9690 0935 0271 8690 06	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

See Less ^

Track Another Package +

Tracking Number: 9171969009350271869020

Remove X

Your item was delivered to an individual at the address at 11:43 am on March 7, 2022 in RENO, NV 89521.

USPS Tracking Plus® Available ✓

✓ Delivered, Left with Individual

March 7, 2022 at 11:43 am
RENO, NV 89521

Feedback

Get Updates ✓

Text & Email Updates	✓
Tracking History	✓
USPS Tracking Plus®	✓
Product Information	✓

See Less ^



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

March 15, 2022

Abdel Khalek
5375 S. Fort Apache Rd Unit 102
Las Vegas, NV 89148

Re: Abdel Khalek and Case No. 22-019-N

Dear Abdel Khalek

The hearing for case number **22-019-N** has been scheduled for Wednesday, April 13, 2022 1:30:00 PM PST or soon thereafter at the following location:

Hilton Garden Inn
7830 South Las Vegas Boulevard
Las Vegas, NV

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 blue ink, appearing to read "K. Mangosing".

Kristopher Mangosing
Assistant Board Coordinator

9171 9690 0935 0271 8695 63

Exhibit 2

Track Another Package +

Track Packages
Anytime, Anywhere

Get the free Informed Delivery® feature to receive automated notifications on your packages
[Learn More](#) (<https://reg.usps.com/vxself?app=UspsTools&ref=homepageBanner&appURL=https%3A%2F%2Finformedelivery.usps.com/box/pages/intro/start.action>)

Tracking Number: 9171969009350271869563

Remove X

Your item was delivered to an individual at the address at 11:25 am on March 21, 2022 in RENO, NV 89521.

USPS Tracking Plus® Available ▾

✓ Delivered, Left with Individual

March 21, 2022 at 11:25 am
RENO, NV 89521

Get Updates ▾

Text & Email Updates	▾
Tracking History	▾
USPS Tracking Plus®	▾
Product Information	▾

See Less ^

Can't find what you're looking for?

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

FAQs

Feedback



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

March 15, 2022

Abdel Khalek
8600 Starboard Ave.
Las Vegas, NV 89117

Re: Abdel Khalek and Case No. 22-019-N

Dear Abdel Khalek

The hearing for case number **22-019-N** has been scheduled for Wednesday, April 13, 2022 1:30:00 PM PST or soon thereafter at the following location:

Hilton Garden Inn
7830 South Las Vegas Boulevard
Las Vegas, NV

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 blue ink, appearing to read "K. Mangosing".

Kristopher Mangosing
Assistant Board Coordinator

9171 9690 0935 0271 8695 87

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NEVADA STATE BOARD OF PHARMACY

985 Damonte Ranch Pkwy Suite 206, Reno, Nevada 89521

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• Web Page: bop.nv.gov

March 15, 2022

Abdel Khalek
320 N. Nellis Blvd., Ste 6
Las Vegas, NV 89110

Re: Abdel Khalek and Case No. 22-019-N

Dear Abdel Khalek

The hearing for case number **22-019-N** has been scheduled for Wednesday, April 13, 2022 1:30:00 PM PST or soon thereafter at the following location:

Hilton Garden Inn
7830 South Las Vegas Boulevard
Las Vegas, NV

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 blue ink, appearing to read "K. Mangosing".

Kristopher Mangosing
Assistant Board Coordinator

9171 9690 0935 0271 8695 70

EXHIBIT 1

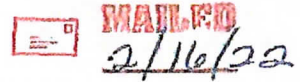
Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH

Ukoshovbera Gbenedio, RPH
Dolly Ave. SW
Atlanta, GA 30331
NIAA 21-178-RPH-N

9171 9690 0935 0265 8778 71



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February 22, 2022 at 4:05 pm
ATLANTA, GA 30331

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Case No. 21-178-RPH-N - 001

EXHIBIT 2

Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH



NEVADA STATE BOARD OF PHARMACY

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• Web Page: bop.nv.gov

March 15, 2022

Ukoshovbera Gbenedio

██████ Dolly Ave. SW
Atlanta, GA 30331

Re: Ukoshovbera Gbenedio and Case No. 21-178-RPH-N

Dear Ukoshovbera Gbenedio

The hearing for case number **21-178-RPH-N** has been scheduled for Wednesday, April 13, 2022 1:30:00 PM PST or soon thereafter at the following location:

Hilton Garden Inn
7830 South Las Vegas Boulevard
Las Vegas, NV

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

9171 9690 0935 0271 8695 94

Case No. 21-178-RPH-N - 002

EXHIBIT 3

Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta
JUN 10 2020
By: JAMES N. HATTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA

v.

THOMAS UKOSHOVERA A. GBENEDIO

Case No. 1:17-cr-430

**First Superseding
Criminal Indictment**

THE GRAND JURY CHARGES THAT:

Background

At all times relevant to this Indictment, unless otherwise specified:

1. The Controlled Substances Act (CSA) governed the manufacture, distribution, and dispensing of controlled substances in the United States. With limited exceptions for medical professionals, the CSA made it "unlawful for any person knowingly or intentionally . . . to manufacture, distribute, or dispense . . . a controlled substance."

2. The CSA and its implementing regulations set forth which drugs and other substances are defined by law as "controlled substances," and assigned those controlled substances to one of five schedules (Schedule I, II, III, IV, or V) depending on their potential for abuse, likelihood of physical or psychological dependency, accepted medical use, and accepted safety for use under medical supervision.

- a. Schedule I drugs have a high potential for abuse, have no currently accepted medical use, and lack accepted safe use. 21 U.S.C. § 812(b)(1).
- b. Schedule II drugs have a currently accepted medical use with severe restrictions and have a high potential for abuse that can lead to severe psychological or physical dependence. 21 U.S.C. § 812(b)(2).
- c. Schedule III drugs have a currently accepted medical use and have a high potential for abuse relative to the drugs in Schedule II. 21 U.S.C. § 812(b)(3).
- d. Schedule IV drugs have a currently accepted medical use and have a low potential for abuse relative to the drugs in Schedule III. 21 U.S.C. § 812(b)(4).
- e. Schedule V drugs have a currently accepted medical use and have a low potential for abuse relative to the drugs in Schedule IV. 21 U.S.C. § 812(b)(5).

3. The term “dispense” means to deliver a controlled substance to an ultimate user or research subject, by, or pursuant to a lawful order of, a practitioner, including the prescribing and administering of a controlled substance and the packaging, labeling, or compounding necessary to prepare the substance for such delivery. 21 U.S.C. § 802(10).

4. The term “distribute” means to deliver (other than by administering or dispensing) a controlled substance or a listed chemical. 21 U.S.C. § 802(11).

5. Under the CSA and its implementing regulations:

- a. Oxycodone is an opioid analgesic classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1)(xiii). It is sold generically and under a variety of brand names, including Oxycontin and Roxicodone.
- b. Hydrocodone is an opioid analgesic classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1)(vi).
- c. Hydrocodone/APAP is an opioid analgesic combined with acetaminophen classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1). It is sold under the brand names Lortab® and Lorcet®.
- d. Hydromorphone is an opioid analgesic classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(b)(1)(vi). Hydromorphone is sold generically and under the brand name Dilaudid.
- e. Methadone is classified as a Schedule II controlled substance. 21 C.F.R. § 1308.12(c)(15) & (16).
- f. Alprazolam is classified as a Schedule IV controlled substance. 21 C.F.R. § 1308.14(c)(1). Alprazolam is sold generically and under the brand name Xanax.
- g. Promethazine with codeine is a phenothiazine antihistamine and narcotic cough suppressant classified as a Schedule V controlled substance.

6. A pharmacy that dispenses, or that proposes to dispense controlled substances, and is authorized to dispense controlled substances by the jurisdiction in which they are licensed, shall obtain a registration from the Attorney General of the United States. 21 U.S.C. § 822(b); 21 C.F.R. § 1306.03. Upon application and approval for registration, the Drug Enforcement Administration (DEA) assigns a unique registration number to each qualifying pharmacy.

7. A prescription for a controlled substance may only be dispensed, or filled, "by a pharmacist, acting in the usual course of his professional practice, and either registered individually or employed in a registered pharmacy" 21 C.F.R. § 1306.06.

8. Under 21 C.F.R. § 1306.04(a), a prescription for a controlled substance "must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice. The responsibility for the proper prescribing and dispensing of controlled substances is upon the prescribing practitioner, but a corresponding responsibility rests with the pharmacist who fills the prescription. An order purporting to be a prescription issued not in the usual course of professional treatment or in legitimate and authorized research [is] not a prescription within the meaning and intent of [the CSA] and the person knowingly filling such a purported prescription, as well as the person issuing it, [is] subject to the penalties provided for violations of the provisions of law relating to controlled substances." 21 C.F.R. § 1306.04(a).

9. Under 21 C.F.R. § 1306.11(a), “[a] pharmacist may dispense directly a controlled substance listed in Schedule II that is a prescription drug as determined under section 503 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 353(b)) only pursuant to a written prescription signed by the practitioner, except as provided in paragraph (d) of this section.”

10. O.C.G.A § 26-4-80(b) makes it unlawful for prescription drugs to be dispensed except pursuant to a valid prescription drug order and requires that a pharmacist not dispense a prescription that the pharmacist knows or should have known is not valid.

11. O.C.G.A § 26-4-80(l) requires a pharmacist to require a person picking up a Schedule II controlled substance prescription to present a government-issued photo identification document or such other form of identification which legally documents legibly the full name of the person taking possession of the Schedule II controlled substances.

The Defendant

12. The defendant THOMAS UKOSHOVERA A. GBENEDIO (the “defendant”) was a pharmacist licensed to practice in the State of Georgia.

13. The defendant owned and operated Ukos Denny, Inc., d/b/a Better Way Pharmacy (“BETTER WAY PHARMACY”), incorporated in the State of Georgia. BETTER WAY PHARMACY was physically located at 6094 Mableton Parkway in Mableton, Georgia, 30126.

14. On or about April 20, 2011, BETTER WAY PHARMACY registered with the DEA to dispense controlled substances in Schedules II through V. The defendant

THOMAS UKOSHOVERA A. GBENEDIO oversaw the day-to-day operations of BETTER WAY PHARMACY, including dispensing controlled substances, interacting with customers, and purchasing the controlled substances dispensed at the pharmacy.

**Counts One through Ten
(Unlawful Drug Dispensing)
(21 U.S.C. § 841(a)(1))**

15. Paragraphs 1 through 14 are re-alleged and incorporated by reference in Counts One through Ten.

16. On or about the dates set forth below, in the Northern District of Georgia, the defendant THOMAS UKOSHOVERA A. GBENEDIO, as described below, did knowingly and intentionally dispense and distribute mixtures and substances containing controlled substances listed below, by filling prescriptions for controlled substances, outside the course of professional practice and for other than a legitimate medical purpose:

Count	Date Filled	Rx No.	Description of Dispensation
1	1/25/2014	59724	promethazine-codeine syrup 240ml, Schedule V (issued to A.M.)
2	1/25/2014	59725	promethazine-codeine syrup 240ml, Schedule V (issued to E.B.)
3	3/6/2014	59865 59866	150 tablets hydromorphone 8mg, Schedule II 150 tablets hydrocodone/apap 10/325mg, Schedule III (issued to L.F.)
4	3/6/2014	59875 59877 59878	promethazine-codeine syrup 240ml, Schedule V 150 tablets oxycodone 30mg, Schedule II 120 tablets hydrocodone/apap 10/325mg, Schedule III (issued to T.L.)

Count	Date Filled	Rx No.	Description of Dispensation
5	3/11/2014	59899 59900	150 tablets hydrocodone/APAP 10/325mg, Schedule III 150 tablets oxycodone 30mg, Schedule II (issued to E.B.)
6	4/11/2014	60042 60043	150 tablets hydrocodone/apap 10/325mg, Schedule III 90 tablets alprazolam 1mg, Schedule IV (issued to L.F.)
7	7/8/2014	60502 60521	120 tablets oxycodone 30mg, Schedule II 120 tablets methadone 10mg, Schedule II (issued to R.C.)
8	7/8/2014	60511 60512	120 tablets oxycodone 30mg, Schedule II 120 tablets methadone 10mg, Schedule II (issued to J.L.)
9	7/8/2014	60523 60524 60525	90 tablets alprazolam 2mg, Schedule IV 60 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II (issued to C.H.)
10	7/8/2014	60530 60532	90 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II (issued to J.H.)

All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), (b)(1)(E), (b)(2), and (b)(3).

**Counts Eleven through Sixty-Nine
(Unlawful Drug Dispensing)
(21 U.S.C. § 841(a)(1))**

17. Paragraphs 1 through 14 are re-alleged and incorporated by reference in Counts Eleven through Sixty-Nine.

18. On or about the dates set forth below, in the Northern District of Georgia, the defendant THOMAS UKOSHOVERA A. GBENEDIO, as described below, did knowingly and intentionally dispense and distribute mixtures and substances containing controlled substances listed below, by filling prescriptions for

controlled substances, outside the course of professional practice and for other than a legitimate medical purpose:

Count	Date Filled	Rx. No.	Description of Dispensation
11	12/8/2014	61151	90 tablets alprazolam 2mg, Schedule IV (issued to M.H.)
12	12/8/2014	61155	90 tablets alprazolam 2mg, Schedule IV (issued to T.H.)
13	12/8/2014	61159	90 tablets alprazolam 2mg, Schedule IV (issued to C.H.)
14	12/9/2014	61165	90 tablets alprazolam 2mg, Schedule IV (issued to I.A.)
15	12/9/2014	61169	90 tablets alprazolam 2mg, Schedule IV (issued to J.L.)
16	12/9/2014	61174	90 tablets alprazolam 2mg, Schedule IV (issued to T.O.)
17	12/11/2014	61192	promethazine-codeine syrup 240ml, Schedule V (issued to R.M.)
18	12/11/2014	61194 61195	promethazine-codeine syrup 240ml, Schedule V 90 tablets alprazolam 2mg, Schedule IV (issued to T.A.)
19	12/11/2014	61199	90 tablets alprazolam 2mg, Schedule IV (issued to M.C.)
20	12/17/2014	61228	90 tablets alprazolam 2mg, Schedule IV (issued to J.B.)
21	12/17/2014	61234	promethazine-codeine syrup 240ml, Schedule V (issued to L.F.)
22	12/17/2014	61232 61235	90 tablets alprazolam 2mg, Schedule IV promethazine-codeine syrup 240ml, Schedule V (issued to T.L.)
23	12/17/2014	61238	120 tablets alprazolam 2mg, Schedule IV (issued to J.N.)
24	12/19/2014	61243	90 tablets alprazolam 2mg, Schedule IV (issued to R.W.)
25	12/19/2014	61245	90 tablets alprazolam 2mg, Schedule IV

Count	Date Filled	Rx. No.	Description of Dispensation
			(issued to J.B.)
26	12/22/2014	61256	120 tablets alprazolam 2mg, Schedule IV (issued to F.L.)
27	1/6/2015	61300 61301 61302	120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 80 tablets methadone 10mg, Schedule II (issued to J.L.)
28	1/6/2015	61303 61304 61305	120 tablets oxycodone 30mg, Schedule II 80 tablets methadone 10mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to T.O.)
29	1/6/2015	61307 61308 61309	80 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to R.C.)
30	1/6/2015	61313 61314 61315	80 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to C.H.)
31	1/6/2015	61316 61318 61319	90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II 80 tablets methadone 10mg, Schedule II (issued to I.A.)
32	1/6/2015	61320 61321 61323	80 tablets methadone 10mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II (issued to M.H.)
33	1/6/2015	61325 61326 61327	80 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to T.H.)
34	1/6/2015	61328 61329 61330	120 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II 90 tablets hydrocodone/apap 10/325mg, Schedule II (issued to L.F.)
35	1/6/2015	61331	120 tablets alprazolam 2mg, Schedule IV

Count	Date Filled	Rx. No.	Description of Dispensation
		61332	150 tablets oxycodone 30mg, Schedule II (issued to D.F.)
36	1/6/2015	61334 61335	promethazine-codeine syrup 240ml, Schedule V 120 tablets alprazolam 2mg, Schedule IV (issued to R.M.)
37	1/9/2015	61359 61360 61361	120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to T.L.)
38	1/9/2015	61363 61364 61365	promethazine-codeine syrup 240ml, Schedule V 120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to J.B.)
39	1/9/2015	61367 61368 61369 61370	120 tablets hydrocodone/apap 10/325mg, Schedule II promethazine-codeine syrup 240ml, Schedule V 120 tablets alprazolam 2mg, Schedule IV 150 tablets oxycodone 30mg, Schedule II (issued to J.N.)
40	1/9/2015	61371 61373 61374	promethazine-codeine syrup 240ml, Schedule V 120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to T.A.)
41	1/14/2015	61391 61392 61393 61394	promethazine-codeine syrup 240ml, Schedule V 120 tablets oxycodone 30mg, Schedule II 120 tablets hydrocodone/apap 10/325mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to R.B.)
42	1/14/2015	61396 61397	120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to J.B.)
43	1/16/2015	61403 61404 61406	90 tablets methadone 10mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II (issued to R.W.)
44	1/16/2015	61408 61409	90 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II

Count	Date Filled	Rx. No.	Description of Dispensation
		61410	90 tablets alprazolam 2mg, Schedule IV (issued to J.B.)
45	1/19/2015	61415 61416 61417	120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II promethazine-codeine syrup 240ml, Schedule V (issued to R.B.)
46	1/19/2015	61418 61419	120 tablets hydrocodone/apap 10/325mg, Schedule II 150 tablets oxycodone 30mg, Schedule II (issued to C.E.)
47	1/22/2015	61439 61440 61441	120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV 120 tablets hydrocodone/apap 10/325mg, Schedule II (issued to S.C.)
48	1/22/2015	61435 61442 61443	120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 120 tablets hydrocodone/apap 10/325mg, Schedule II (issued to T.B.)
49	1/27/2015	61444 61449 61450	150 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to M.C.)
50	1/31/2015	61477 61478 61479 61480	promethazine-codeine syrup 240ml, Schedule V 120 tablets hydrocodone/apap 10/325mg, Schedule II 150 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to J.E.)
51	2/3/2015	61488	120 tablets hydrocodone/apap 10/325mg, Schedule II (issued to J.B.)
52	2/3/2015	61489 61490 61491 61492	120 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II 150 tablets hydrocodone/apap 10/325mg, Schedule II promethazine-codeine syrup 240ml, Schedule V (issued to T.L.)
53	2/3/2015	61493 61494 61495	150 tablets oxycodone 30mg, Schedule II 120 tablets hydrocodone/apap 10/325mg, Schedule II promethazine-codeine syrup 240ml, Schedule V

Count	Date Filled	Rx. No.	Description of Dispensation
		61496	120 tablets alprazolam 2mg, Schedule IV (issued to F.L.)
54	2/3/2015	61497 61498 61499	90 tablets alprazolam 2mg, Schedule IV 120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II (issued to L.F.)
55	2/4/2015	61507 61509 61510	90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II 90 tablets methadone 10mg, Schedule II (issued to T.H.)
56	2/4/2015	61511 61512 61514	90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II 90 tablets methadone 10mg, Schedule II (issued to C.H.)
57	2/4/2015	61515 61516 61517	90 tablets methadone 10mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II (issued to M.H.)
58	2/4/2015	61519 61520 61522	120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 90 tablets methadone 10mg, Schedule II (issued to I.A.)
59	2/4/2015	61523 61525 61526	120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 90 tablets methadone 10mg, Schedule II (issued to R.C.)
60	2/4/2015	61528 61529 61530	90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II 90 tablets methadone 10mg, Schedule II (issued to T.O.)
61	2/4/2015	61481 61504 61531 61532 61533 61535	90 tablets methadone 10mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 90 tablets methadone 10mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II

Count	Date Filled	Rx. No.	Description of Dispensation
			(issued to J.L.)
62	2/6/2015	61562 61566	120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to R.M.)
63	2/6/2015	61565 61567	120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II (issued to T.A.)
64	2/6/2015	61568 61569 61570	120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to J.N.)
65	2/10/2015	61577 61578 61579	120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to R.B.)
66	2/13/2015	61595 61596 61597	120 tablets oxycodone 30mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV 90 tablets hydrocodone/apap 10/325mg, Schedule II (issued to R.W.)
67	2/13/2015	61599 61600 61602	120 tablets oxycodone 30mg, Schedule II 90 tablets methadone 10mg, Schedule II 90 tablets alprazolam 2mg, Schedule IV (issued to J.B.)
68	2/16/2015	61603 61604	120 tablets alprazolam 2mg, Schedule IV 120 tablets oxycodone 30mg, Schedule II (issued to R.B.)
69	2/16/2015	61605 61606 61607	120 tablets hydrocodone/apap 10/325mg, Schedule II 120 tablets oxycodone 30mg, Schedule II 120 tablets alprazolam 2mg, Schedule IV (issued to C.E.)

All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C),
(b)(2), and (b)(3).

**Counts Seventy through Seventy-Two
(Unlawful Drug Dispensing)
(21 U.S.C. § 841(a)(1))**

19. Paragraphs 1 through 14 are re-alleged and incorporated by reference in Counts Seventy through Seventy-Two.

20. On or about the dates set forth below, in the Northern District of Georgia, the defendant THOMAS UKOSHOVBERA A. GBENEDIO, as described below, did knowingly and intentionally dispense and distribute mixtures and substances containing controlled substances listed below, by filling the following prescription for a controlled substance, outside the course of professional practice and for other than a legitimate medical purpose:

Count	Date Filled	Rx No.	Description of Dispensation
70	5/28/2015	61929	112 tablets oxycodone 30mg, Schedule II (issued to A.F.)
71	7/23/2015	62117	84 tablets oxycodone 30mg, Schedule II (issued to A.F.)
72	1/12/2016	62877	84 tablets oxycodone 30 mg Schedule II (issued to A.F.)

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**Count Seventy-Three
(21 U.S.C. § 842(a)(6))
(Refusal of Inspection)**

21. Paragraphs 12 through 14 are re-alleged and incorporated by reference in Count Seventy-Three.

22. On or about April 13, 2017, in the Northern District of Georgia, the defendant, THOMAS UKOSHOVBERA A. GBENEDIO, knowingly refused the

inspection of Better Way Pharmacy, as authorized by an administrative inspection warrant issued under Title 21, United States Code, Section 880;

All in violation Title 21, United States Code, Section 842(a)(6).

Forfeiture Allegation

Upon conviction of one or more of the offenses alleged in Counts One through Seventy-Two of this Superseding Indictment, the defendant THOMAS UKOSHOVERA A. GBENEDIO, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including, but not limited to, the following:

- a. MONEY JUDGMENT: A sum of money in United States currency equal to the amount of proceeds the defendant obtained as a result of the offenses for which the defendant is convicted.
- b. PROFESSIONAL LICENSE:
 1. The State of Georgia Pharmacist license number RPH019006 held in the name of Ukoshovbera Thomas A. Gbenedio.
 2. The State of Georgia Retail Pharmacy license number PHRE009734 held in the name of Better Way.
- c. REAL PROPERTY:

816 Dolly Avenue, Atlanta, Fulton County, Georgia, and all buildings and appurtenances thereon, more particularly described as:

All that tract or parcel of land lying and being in Land Lot 105 of the 14FFTH District, Fulton County, Georgia, being Lot 42, Madison Trace Subdivision, Phase II, as per plat recorded in Plat Book 221, Page 141-142, Fulton County, Georgia records, which recorded plat is incorporated herein by this reference and made a part of this description.

Parcel ID: 14F0105 LL0778

d. CURRENCY AND FUNDS:

1. \$16,379.29 in funds from 1st Choice Credit Union account number XXXXXXXXXX6157 held in the name of Thomas U. A. Gbenedio.
2. \$5,738.94 in funds from Branch Banking & Trust account number XXXXXXXXXX8934 held in the name of Ukos Denny Inc. DBA Better Way Pharmacy.

e. VEHICLE:

1. 2008 Mercedes Benz GL450, VIN 4JGBF71E68A368260.

If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property or seek a money judgment against said defendant for any amount that would constitute the proceeds of such violation.

A True BILL
Angela Ransough
FOREPERSON

BYUNG J. PAK
United States Attorney

Erin H. Harris
ERIN H. HARRIS
Assistant United States Attorney
GA Bar No. 294435

Angela Adams
ANGELA ADAMS
Assistant United States Attorney
Georgia Bar No. 613114

600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
404-581-6000; Fax: 404-581-6181

EXHIBIT 4

Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta

OCT 29 2021

KEVIN P. WEIMER, Clerk

By *Jordan Holden* Deputy Clerk

UNITED STATES OF AMERICA

v.

THOMAS UKOSHOVERA A. GBENEDIO

Criminal Action No.

1:17-CR-430-TWT

VERDICT

1. As to **Count One** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

2. As to **Count Two** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

3. As to **Count Three** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

4. As to **Count Four** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

5. As to **Count Five** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

6. As to **Count Six** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

7. As to **Count Seven** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

8. As to **Count Eight** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

9. As to **Count Nine** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

10. As to **Count Ten** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

11. As to **Count Eleven** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

12. As to **Count Twelve** of the Superseding Indictment, we the jury, unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty

_____ Not Guilty

13. As to **Count Thirteen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

14. As to **Count Fourteen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

15. As to **Count Fifteen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

16. As to **Count Sixteen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

17. As to **Count Seventeen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

18. As to **Count Eighteen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

19. As to **Count Nineteen** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

20. As to **Count Twenty** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

21. As to **Count Twenty-One** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

22. As to **Count Twenty-Two** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

23. As to **Count Twenty-Three** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

24. As to **Count Twenty-Four** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

25. As to **Count Twenty-Five** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

26. As to **Count Twenty-Six** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

27. As to **Count Twenty-Seven** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

28. As to **Count Twenty-Eight** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

29. As to **Count Twenty-Nine** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

30. As to **Count Thirty** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

31. As to **Count Thirty-One** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

32. As to **Count Thirty-Two** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

33. As to **Count Thirty-Three** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

34. As to **Count Thirty-Four** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

35. As to **Count Thirty-Five** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

36. As to **Count Thirty-Six** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

37. As to **Count Thirty-Seven** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

38. As to **Count Thirty-Eight** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

39. As to **Count Thirty-Nine** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

40. As to **Count Forty** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

41. As to **Count Forty-One** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

42. As to **Count Forty-Two** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

43. As to **Count Forty-Three** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

44. As to **Count Forty-Four** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

45. As to **Count Forty-Five** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

46. As to **Count Forty-Six** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

47. As to **Count Forty-Seven** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

48. As to **Count Forty-Eight** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

49. As to **Count Forty-Nine** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

50. As to **Count Fifty** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

51. As to **Count Fifty-One** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

52. As to **Count Fifty-Two** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

53. As to **Count Fifty-Three** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

54. As to **Count Fifty-Four** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

55. As to **Count Fifty-Five** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

56. As to **Count Fifty-Six** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

57. As to **Count Fifty-Seven** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

58. As to **Count Fifty-Eight** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

59. As to **Count Fifty-Nine** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

60. As to **Count Sixty** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

61. As to **Count Sixty-One** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty ☐ Not Guilty

62. As to **Count Sixty-Two** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

63. As to **Count Sixty-Three** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

64. As to **Count Sixty-Four** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

65. As to **Count Sixty-Five** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

66. As to **Count Sixty-Six** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

67. As to **Count Sixty-Seven** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

68. As to **Count Sixty-Eight** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

☒ Guilty

☐ Not Guilty

69. As to **Count Sixty-Nine** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

70. As to **Count Seventy** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

71. As to **Count Seventy-One** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

 Guilty ✓ Not Guilty

72. As to **Count Seventy-Two** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

 Guilty ✓ Not Guilty

73. As to **Count Seventy-Three** of the Superseding Indictment, we the jury,
unanimously find Defendant Thomas Ukoshovbera A. Gbenedio

✓ Guilty Not Guilty

SO SAY WE ALL.

Signed and dated at the United States Courthouse, Atlanta, Georgia, this 29th
day of October 2021.

#6


Foreperson's Signature

Patrick Lohmeyer
Foreperson's Printed Name

EXHIBIT 5

Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH

Renewal Application Pharmacist

Application Fee : \$180.00
Convenience Fee : \$10.00
License Number : 09407
License Type : Pharmacist
New Expiration Date : 10/31/2021

Renewal Type

Please confirm the status that you are renewing before moving to the next section.

☒ Active

☐ Inactive

[Proceed to Renew](#)

Personal Information

First Name : Ukoshovbera

Middle (initial only) : A.T.

Last Name : Gbenedio

License # : 09407

If you make an unnecessary change to your address, it will delay the processing of your renewal. Only make the change if it is a true address change. Example: Do not add punctuation or change St to Street.

Practice Address :

Name/Practice Name/DBA :

Military Address : ☐

Street : DOLLY AVE SW

Country : United States

City : ATLANTA

State : Georgia

Zip : 30331

Practice Phone :

Practice Fax : (XXX) XXX-XXXX

☐ Select if the Practice Address is your mailing address

The address you select as the mailing address will be shown on the certificate

Home Address :

Military Address : ☐

Street : DOLLY AVE SW

Country : United States

City : ATLANTA

State : Georgia

Zip : 30331

Home Phone : (XXX) XXX-XXXX

Cell Phone :

Email Address :

Fax : (XXX) XXX-XXXX

☒ Select if the Home Address is your mailing address

The address you select as the mailing address will be shown on the certificate

Nevada Business License Information - Check appropriate answer

☒ I DO NOT have a Nevada Business license number.

☐ I HAVE APPLIED for a Nevada Business License with the Nevada Secretary of State in Compliance with provisions of NRS Chapter 76 and my application is pending.

☐ I have a Nevada Business License number assigned by the Secretary of State in compliance with the provisions of NRS Chapter 76789066.

Name on Business License :

Business License # :

Case No. 21-178-RPH-N - 031

Child Support Information – Check appropriate answer

- ☒ I am NOT SUBJECT to a court order for the support of a child.
- ☐ I am SUBJECT to a court order for the support of one or more children and am in compliance with the order or am in compliance with a plan approved by the district attorney or other public agency enforcing the order for the repayment of the amount owed pursuant to the order.
- ☐ I am SUBJECT to a court order for the support of one or more children and am NOT in compliance with the order or am NOT in compliance with a plan approved by the district attorney or other public agency enforcing the order for the repayment of the amount owed pursuant to the order.

Military Service Information

Have you ever served in the military : ☐ Yes ☒ No

Legal Information

1. Since your last renewal or recent licensure have you been diagnosed or treated for any mental illness, including alcohol or substance abuse, or Physical condition that would impair your ability to perform the essential functions of your license? ☐ Yes ☒ No
2. Since your last renewal or recent licensure have you been charged, arrested or convicted of a felony or misdemeanor in any state? ☐ Yes ☒ No
3. Since your last renewal or recent licensure have you been the subject of a board citation or an administrative action whether completed or pending in any state? ☐ Yes ☒ No
4. Since your last renewal or recent licensure have you had your license subjected to any discipline for violation of pharmacy or drug laws in any state? ☐ Yes ☒ No

CE Hours

By signing below, you certify that you have completed ALL required CE Hours due for the 19/21 Renewal period. (Dated from Nov. 1, 17 – Oct. 31, 19, 1.25hrs per mo). The exemption period is 2yrs after graduation only.

Acknowledgement and Declaration

I understand that it is a violation of Nevada law to falsify this application, and sanctions may be imposed for fraud or misrepresentation. I affirm that I have read this application and the statements made are true and correct. I understand and will comply with the guidelines of the Centers for Disease Control and Prevention concerning the prevention of transmission of infectious agents through safe injection practices. I understand that NRS 432B.220 requires that if, in my professional capacity, I know or have reason to believe that a child has been abused or neglected, I am mandated to report the abuse/neglect to an agency which provides child welfare services or to a local law enforcement agency.

Signature : ukoshovbera gbenedio

Date Of Application : 09/19/2019

Please type only the First and Last Name that are listed at the top of the page.

Fee Detail(s)

The fees for license renewal are NON REFUNDABLE. Please ensure the accuracy of your information.

Description	Fee Type	Fee
Renewal Period from 11/1/2019 to 10/31/2021	License Renewal Fee	\$180.00
	Convenience Fee	\$10.00
	Late Fee	\$0.00
	Total :	\$190.00

Fee and Payment

Payment Method : Credit / Debit Card ▼

Application Fees : 180

Convenience Fee : 10

Late Fees : 0

Reference Number : 61919353350

InvoiceDate : 09/19/2019

Paid

Pay & Submit

Case No. 21-178-RPH-N - 032

EXHIBIT 6

Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH

Renewal Application Pharmacist

Application Fee : \$200.00
Convenience Fee : \$10.00
License Number : 09407
License Type : Pharmacist
New Expiration Date : 10/31/2023

Renewal Type

Please confirm the status that you are renewing before moving to the next section.

☒ Active

☐ Inactive

[Proceed to Renew](#)

Personal Information

First Name : Ukoshovbera

Middle (initial only) : A.T.

Last Name : Gbenedio

License # : 09407

If you make an unnecessary change to your address, it will delay the processing of your renewal. Only make the change if it is a true address change. Example: Do not add punctuation or change St to Street.

Practice Address :

Name/Practice Name/DBA :

Military Address : ☐

Street : DOLLY AVE SW

Country : United States

City : ATLANTA

State : Georgia

Zip : 30331

Practice Phone :

Practice Fax : (XXX) XXX-XXXX

☐ Select if the Practice Address is your mailing address

The address you select as the mailing address will be shown on the certificate

Home Address :

Military Address : ☐

Street : 816 DOLLY AVE SW

Country : United States

City : ATLANTA

State : Georgia

Zip : 30331

Home Phone :

Cell Phone :

Email Address :

Fax : (XXX) XXX-XXXX

☒ Select if the Home Address is your mailing address

The address you select as the mailing address will be shown on the certificate

Sex : Male

Practice License Number:

Specialty:

Nevada Business License Information - Check appropriate answer

☒ I DO NOT have a Nevada Business license number.

☐ I HAVE APPLIED for a Nevada Business License with the Nevada Secretary of State in Compliance with provisions of NRS Chapter 76 and my application is pending.

☐ I have a Nevada Business License number assigned by the Secretary of State in compliance with the provisions of NRS Chapter 76789066.

Name on Business License :

Business License # :

Case No. 21-178-RPH-N - 033

Child Support Information – Check appropriate answer

- ☒ I am NOT SUBJECT to a court order for the support of a child.
- ☐ I am SUBJECT to a court order for the support of one or more children and am in compliance with the order or am in compliance with a plan approved by the district attorney or other public agency enforcing the order for the repayment of the amount owed pursuant to the order.
- ☐ I am SUBJECT to a court order for the support of one or more children and am NOT in compliance with the order or am NOT in compliance with a plan approved by the district attorney or other public agency enforcing the order for the repayment of the amount owed pursuant to the order.

Military Service Information

- Have you ever served on active duty in the Armed Forces of the United States and separated from such service under condition other than dishonorable? ☐ Yes ☒ No
- Have you ever been assigned to duty for minimum of 6 continuous years in National Guard or a reserve component of the Armed Forces of the United States and separated from such service under conditions other than dishonorable? ☐ Yes ☒ No
- Have you ever served the Commissioned Corp of the United States Public Service or the Commissioned Corp of the National Oceanic and Atmospheric Administration of the United States in the capacity of the commissioned officer while on active duty in defense of the United States and separated from such service under conditions other than dishonorable? ☐ Yes ☒ No

Legal Information

1. Since your last renewal or recent licensure have you been diagnosed or treated for any mental illness, including alcohol or substance abuse, or Physical condition that would impair your ability to perform the essential functions of your license? ☐ Yes ☒ No
2. Since your last renewal or recent licensure have you been charged, arrested or convicted of a felony or misdemeanor in any state? ☐ Yes ☒ No
3. Since your last renewal or recent licensure have you been the subject of a board citation or an administrative action whether completed or pending in any state? ☐ Yes ☒ No
4. Since your last renewal or recent licensure have you had your license subjected to any discipline for violation of pharmacy or drug laws in any state? ☐ Yes ☒ No

CE Hours

By signing below, you certify that you have completed ALL required CE Hours due for the 19/21 Renewal period. (Dated from 11/01/2019 – 10/31/2021; 1.25hrs per mo.). The exemption period is 2yrs after graduation only.

Acknowledgement and Declaration

I understand that it is a violation of Nevada law to falsify this application, and sanctions may be imposed for fraud or misrepresentation. I affirm that I have read this application and the statements made are true and correct. I understand and will comply with the guidelines of the Centers for Disease Control and Prevention concerning the prevention of transmission of infectious agents through safe injection practices. I understand that NRS 432B.220 requires that if, in my professional capacity, I know or have reason to believe that a child has been abused or neglected, I am mandated to report the abuse/neglect to an agency which provides child welfare services or to a local law enforcement agency.

Signature : Ukoshovbera Gbenedio

Date Of Application : 10/04/2021

Please type only the First and Last Name that are listed at the top of the page.

Fee Detail(s)

The fees for license renewal are NON REFUNDABLE. Please ensure the accuracy of your information.

Description	Fee Type	Fee
Renewal Period from 11/1/2021 to 10/31/2023	License Renewal Fee	\$200.00
	Convenience Fee	\$10.00
	Late Fee	\$0.00
	Total :	\$210.00

Fee and Payment

Payment Method : Credit / Debit Card ▼

Application Fees : 200

Reinstatement Fee : 0

Transaction Fee : 10

Late Fees : 0

Reference Number : 63280644697

InvoiceDate : 10/04/2021

Paid

Pay & Submit

EXHIBIT 7

Case No. 21-178-RPH-N

UKOSHOVBERA A.T.

GBENEDIO, RPH

TOTAL TIME SUMMARY

Case No. 21-178-RPH-N – UKOSHOVBERA THOMAS GBENEDIO

Attorney Peter Keegan – 5.7 hours @\$55.00/hr = **\$313.50**

Board Coordinator Kristopher Mangosing – 1.0 hours @31.86/hr = **\$31.86**

Board Coordinator Shirley Hunting – 1.0 hours @38.77/hr = **\$38.77**

Total **\$384.13**

Timesheet for Peter Keegan – Case No. 21-178-RPH-N – Ukoshovbera T. Gbenedio

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

October 26, 2021	1.3
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Review subpoena in criminal case 1:17-cr-430, telephone conference to Strickland Webster RE: same, create custodian of records declaration and compile responsive application date to subpoena.

12.22.21	2.2
----------	-----

Draft accusation, research licensing history, research outcome of criminal case 1:17-cr-430.

1.4.22	0.7
--------	-----

Review and edit accusation after General Counsel edits.

4.4.2022	1.0
----------	-----

Compile Exhibits and Attorney Fees and Costs for April 13, 2022, Board Meeting.

4.13.2022	0.5
-----------	-----

Prepare for and prosecute hearing in Case 21-178-RPJ-N, provide documentation of attorney's fees and costs to Respondent.

TOTAL 5.7 hours x \$55.00/hour = \$313.50

Timesheet for Kristopher Mangosing --

UKOSHOBERA GBENEDIO - CASE NO. 21-178-RPH-N

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

3/15/2022	0.50
------------------	-------------

Prepared/ Mailed 21 day notice

3/29/2022	0.50
------------------	-------------

Prepared Board meeting material

TOTAL 1.00 hours x \$31.86/hour = \$31.86

Timesheet for Shirley Hunting –

GBENEDIO, UKOSHOVBERA, Certificate of Registration No. 09407 - Case No. 21-178-RPH-N

DATE **TIME**

Date	Hours	Activity
02/16/2022	1	Prepared Accusation for filing/mailling.

Total Hours

Rate 38.77

Total Costs 38.77

EXHIBIT 1

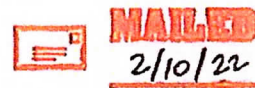
Case No. 21-217-CS-S

Rajkamal S. Hansra, MD

Rajkamal Hansra
[REDACTED] W Charleston Blvd [REDACTED]
Las Vegas, NV 89102
21-217-CS-S
NIAA/Cease and Desist



9171 9690 0935 0265 8777 41



USPS Tracking®**FAQs >****Track Another Package +****Tracking Number:** 9171969009350265877741

Remove X

Your item was returned to the sender at 9:12 am on February 12, 2022 in LAS VEGAS, NV 89102 because the forwarding order for this address is no longer valid.

USPS Tracking Plus® Available ✓**Forward Expired**

February 12, 2022 at 9:12 am
LAS VEGAS, NV 89102

Feedback

Get Updates ✓**Text & Email Updates****Tracking History****USPS Tracking Plus®****Product Information****See Less** ^

Nevada State Board of Pharmacy
985 Damonte Ranch Parkway Suite 206
Reno, Nevada 89521
Return Service Requested

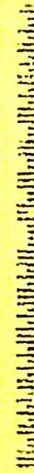


ncopost[®] FIRST-CLASS MAIL
02/10/2022
US POSTAGE \$008.362
ZIP 89521
041L12204892

ncopost[®]
02/10/2022
US POSTAGE \$001.509
ZIP 89521
041L12204892

u/f

-R-T-5- 891025043-1N 03/01/22
RETURN TO SENDER
UNABLE TO FORWARD
UNABLE TO FORWARD
RETURN TO SENDER



Domestic Return Based on

EXHIBIT 2

Case No. 21-217-CS-S

Rajkamal S. Hansra, MD



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

March 15, 2022

Rajkamal Hansra

██████ W. Charleston Blvd. ██████

Las Vegas, NV 89102

Re: Rajkamal Hansra and Case No. 21-217-CS-S

Dear Rajkamal Hansra

The hearing for case number 21-217-CS-S has been scheduled for Wednesday, April 13, 2022 1:30:00 PM PST or soon thereafter at the following location:

Hilton Garden Inn
7830 South Las Vegas Boulevard
Las Vegas, NV

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

9171 9690 0935 0271 8696 00

Case No. 21-217-CS-S - 005

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FAQs 1

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automated notifications on your packages

Learn More

<https://usps.com/track/track-package>

<https://usps.com/track/track-package>

Tracking Number: 9171969009350271869600

Remove X

Your item has been delivered to the original sender at 11:25 am on March 21, 2022 in RENO, NV 89521.

USPS Tracking Plus® Available v

 **Delivered, To Original Sender**

March 21, 2022 at 11:25 am
RENO, NV 89521

Get Updates v

Text & Email Updates	v
Tracking History	v
USPS Tracking Plus®	v
Product Information	v

See Less ^

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FAQs

Nevada State Board of Pharmacy

985 Damonte Ranch Parkway, Suite 206 • Reno, Nevada 89521

ADDRESS SERVICE REQUESTED



CERTIFIED MAIL



9171 9690 0935 0271 8696 00

ANK



March 15, 2022

Rajkamal Hansra

W. Charleston Blvd.

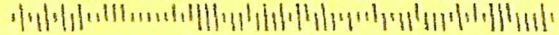
Las Vegas, NV 89102

NIXIE 892 FEB 1 0000/19/22

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

8910232312 ANK
89521>4881

RC 89521488156 72841-68856-25-38



Case No. 21-217-CS-S - 007

EXHIBIT 3

Case No. 21-217-CS-S

Rajkamal S. Hansra, MD

Script Details - Rx Number: 859454-4763

Script Front Image

<p><i>MTN-160576524 BP 2/15/18</i></p> <p>JMC NSCU Phone: 702-333-1870 1800 W. Charleston Blvd. Las Vegas NV 89102</p> <p>Date: Nov 22, 2018</p> <p>Patient Name: [REDACTED] Address: [REDACTED] Phone: [REDACTED] Patient Weight: 63 kg (150 lb)</p> <p>Rx: oxycodone-acetaminophen (PERCOCET) 5-325 mg per tablet Order ID (17319976) Route: oral</p> <p>Sig: Take 2 tablets by mouth every 4 (hour) hours as needed for severe pain for up to 7 days.</p> <p>Qty: 30 (Thirty) tablets ✓ Risk: "0 (Zero)" Opioid Supply: 7 Days Comments: Take 1-2 tabs every 4-6 hours PRN severe headache. Do not take if you have had a seizure, without loss of consciousness, or sequelae (CNS/HCC) (S06.5X05)</p> <p>Signature: [REDACTED] Pharmacist: [REDACTED] NUP: 103177600 Security Machine ("M") Border for quality and full amount, photograph and attach to this form. If a magnification must show original prescription, use this direction.</p>	<p>This section is intentionally blank.</p>
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Script Back Image

No Back Image Available

Annotations

No Annotations

This report is considered a confidential Walgreens document. It is intended to be used for Board of Pharmacy/DEA audits. Professional discretion should be used prior to releasing this document.

EXHIBIT 4

Case No. 21-217-CS-S

Rajkamal S. Hansra, MD

TOTAL TIME SUMMARY

Case No. 21-217-CS-S – RAJKAMAL HANSRA, MD

Investigator Dena McClish – 1.08 @\$43.00/hr = **\$46.44**

Attorney Peter Keegan – 9 hours @\$55.00/hr = **\$495.00**

Board Coordinator Darlene Nases – 1.00 hours @\$21.00/hr = **\$21.00**

Board Coordinator Kristopher Mangosing – 1.0 hours @31.86/hr = **\$31.86**

Total **\$594.30**

Timesheet for Dena McClish

CONTROLLED SUBSTANCE EXPIRED CASES (TWENTY (20) PRESCRIBERS) – MULTIPLE CASE NUMBERS

DATE	TIME	Per Prescriber
------	------	----------------

10/2019 (multiple days)	15	0.75
-------------------------	----	------

Cross check report w/ license info, prepare excel worksheet, run prescriber PMPs, request and review prescription copies, ROI for **20 prescribers**

12/20/21	1.5	0.1
----------	-----	-----

Upload rx docs into InLumen for individual cases for **15 prescribers**

1/5/22	0.5	0.03
--------	-----	------

Conf call w/ counsel on **15 prescribers**

1/6/22	0.75	
--------	------	--

Research on RXs by **O'Connor**, email w/ DEA

1/25/22	0.5	
---------	-----	--

Phone w/ DEA re **O'Connor**, email to counsel & licensing

1/27/22	3	0.2
---------	---	-----

Update PMPs on **15 prescribers**, pull addt'l rxs, report to counsel for Bannen, Heeren, Martinez, Nguyen, Washington, request C&D from counsel

2/23/22 & 2/24/22	1	
-------------------	---	--

Bannen death cert research, pull & review pmp & Rx copy; contact pharmacy for fraud rx alers

TOTAL 22.25 hours x \$43/hour = \$956.75

Per Prescriber 1.08 Hours X \$43/hour = \$46.44

Timesheet for Peter Keegan – RAJKAMAL HANSRA, MD - CASE NO. 21-217-CS-S

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

1/7/2022	3.5
----------	-----

Review investigative file; legal research; discuss investigation with Board staff including Prescription Monitoring Program Manager Darla Zarley and General Counsel Brett Kandt; begin draft Notice of Intended Action and Accusation in Case No. 21-217-CS-S.

1/26/2022	1.5
-----------	-----

Finalize Notice of Intended Action and Accusation in Case No. 21-217-CS-S; proofread and submit to Board Coordination staff Shirley Hunting for mailing/service of process.

2/12/2022	0.5
-----------	-----

Confirm returned certified mailing of Notice of Intended Action and Accusation via USPS on February 12, 2022, for address no longer valid at 1701 W. Charleston Blvd. #230, Las Vegas, Nevada 89102

2/22/2022	1.0
-----------	-----

Attempt to contact Respondent Rajkamal Hansra at rajkamal.hansra@unlv.edu and last known telephone number unsuccessfully. Contact Nevada Board of Medical Examiners to cross-reference possible contact options. Obtain new telephone number and attempt, unsuccessfully to reach Respondent Dr. Hansra.

4/4/2022	0.5
----------	-----

Prepare Exhibit packet and review investigation; emails with investigator Dena McClish to prepare for testimony at hearing.

4/5/2022	1.0
----------	-----

Prepare updated documentation of attorney's fees and recoverable costs

4/13/2022	1.0
-----------	-----

Prosecute hearing in Case 21-217-CS-S.

TOTAL 9 hours x \$55.00/hour = \$495.00

Timesheet for Kristopher Mangosing –

RAJKAMAL HANSRA - CASE NO. 21-217-CS-S

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

3/15/2022	0.50
-----------	------

Prepared/ Mailed 21 day notice

3/29/2022	0.50
-----------	------

Prepared Board meeting material

TOTAL 1.00 hours x \$31.86/hour = \$31.86

Timesheet for Darlene Nases –

RAJKAMAL HANSRA, MD – CASE NO. 21-217-CS-S

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

2/8/22	0.50
--------	------

Prepare Cease & Desist and Notice of Intended Action and Accusation

2/10/22	0.50
---------	------

Certified, mailed, and tracked Cease & Desist and Notice of Intended Action and Accusation

TOTAL 1 hours x \$21/hour = \$21.00

EXHIBIT 1

Case No. 21-219-CS-S

Robert E. Hill, DDS

Robert Hill
6680 W Flamingo Rd #11
Las Vegas, NV 89103
21-219-CS-S
NIAA/ Cease and Desist

9171 9690 0935 0265 8777 65



Track Another Package +

Tracking Number: 9171969009350265877765

Remove X

Your item was returned to the sender at 8:11 am on February 12, 2022 in LAS VEGAS, NV 89103 because the forwarding order for this address is no longer valid.

USPS Tracking Plus® Available ✓

Forward Expired

February 12, 2022 at 8:11 am
LAS VEGAS, NV 89103

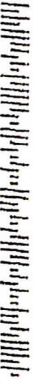
Feedback

Get Updates ✓

Text & Email Updates	✓
Tracking History	✓
USPS Tracking Plus®	✓
Product Information	✓

See Less ^

POSTNET



Nevada State Board of Pharmacy
985 Damonte Ranch Parkway Suite 206
Reno, Nevada 89521
Return Service Requested



9171 9690 0935 0265 8777 65

16000504
02/10/2022
FIRST-CLASS MAIL
US POSTAGE \$008.36
ZIP 89521
041L12304892

16000504
02/10/2022
FIRST-CLASS MAIL
US POSTAGE \$001.50
ZIP 89521
041L12304892

Robert Hill
6680 W Flamingo Rd #11
Las Vegas, NV 89103



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SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Robert Hill 6680 W Flamingo Rd #11 Las Vegas, NV 89103</p> <p>2. Article Number (Transfer from service label) 9171 9690 0935 0265 8777 65</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) G. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail <input type="checkbox"/> Mail Restricted Delivery</p> <p>Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

EXHIBIT 2

Case No. 21-219-CS-S

Robert E. Hill, DDS



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

March 15, 2022

Robert Hill
6680 W. Flamingo #11
Las Vegas, NV 89103

Re: Robert Hill and Case No. 21-219-CS-S

Dear Robert Hill

The hearing for case number 21-219-CS-S has been scheduled for Wednesday, April 13, 2022 1:30:00 PM PST or soon thereafter at the following location:

Hilton Garden Inn
7830 South Las Vegas Boulevard
Las Vegas, NV

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

9171 9690 0935 0271 8696 17

Case No. 21-219-CS-S - 005

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Page 3

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Track Packages
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automated notices from your packages

Learn More

[https://tools.usps.com/go/TrackConfirmAction?tRef=fullpage&tlc=2&txt=28777=&tlLabels=9171969009350271869617%2C](#)

Tracking Number: 9171969009350271869617

Remove X

Your item departed our USPS facility in RENO NV DISTRIBUTION CENTER on March 21, 2022 at 5:55 pm. The item is currently in transit to the destination.

USPS Tracking Plus® Available v

Departed USPS Regional Facility

March 21, 2022 at 5:55 pm
RENO NV DISTRIBUTION CENTER

Get Updates v

Text & Email Updates	v
Tracking History	v
USPS Tracking Plus®	v
Product Information	v

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FAQs

Nevada State Board of Pharmacy
985 Damonte Ranch Parkway, Suite 206 • Reno, Nevada 89521

ADDRESS SERVICE REQUESTED



CERTIFIED MAIL



9171 9690 0935 0271 8696 17

RECEIVED NV 895

APR 14 2022 PM 2 3



March 15, 2022

Robert Hill
6680 W. Flamingo #11
Las Vegas, NV 89103

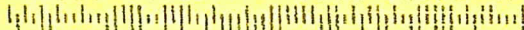
NIAIE 891 FE 1 0003/17/22

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

ANK

691093216#881

SC: 89521488156 12041 88871 15-38



Case No. 21-219-CS-S - 007

EXHIBIT 3

Case No. 21-219-CS-S

Robert E. Hill, DDS

CVS/pharmacy

Telephone Order Prescription Pad

Date/Time: 1-21-19 2:40

Name: [redacted]

DOB: [redacted]

☐ Infant/Pediatric

Phone: [redacted]

Address: [redacted] paradise
Garden rd Apt. [redacted]

Allergies: [redacted] but veges 89169



pen vk 500 mg

at 20 2start 1 Q6hs 46

transdermal 50mg #2 = 7 days

1st 11 Q4hs prn F13.20

Medication Purpose: Refills: 0

Read Back: ☐ DOB ☐ Drug Name ☐ Strength ☐ Directions

Interchange is mandated unless the prescriber writes the words "No Substitution" in this space

Phoned in by: Niki

Voice Mail ☒

Prescriber: Robert Hills

Phone: 702 871 5671

DEA or State license number: AG 10494615

Address: 6680 W. Flamingo Rd Ste 11
LV, NV 89123

OPR 378 P - 03 09 Item = 182779

CVS Staff Initials: Auto


Script Details - Rx Number: 2178144-4755

Script Front Image

Walgreens Initials Q Promised Time _____
Name [REDACTED] K [REDACTED] Date 12-15-18
Address _____ AL/HC _____
Phone# _____ Birth Date [REDACTED]

ICD10: 90K04.7 Tramadol 50mg #10
1/2 - 1 tab Q4° prn pain
(5 days supply)

Dr. _____ Dr. Hill, R
DISPENSE AS WRITTEN SUBSTITUTION PERMISSIBLE
Refill _____ Address _____
Phone# 871-5671 DEA/NPI# 011049441
VM/Caller ID Dikici WIC# 964880



Script Back Image

No Back Image Available

Annotations

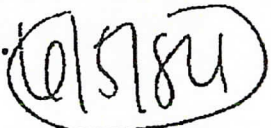
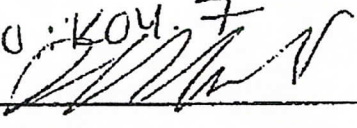
No Annotations

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Case No. 21-219-CS-S - 009

Script Details - Rx Number: 2198338-4755

Script Front Image

ROBERT E. HILL, D.D.S.		
6680 W. FLAMINGO #11 LAS VEGAS, NEVADA 89103		
TELEPHONE 871-5671	DEA REG. No. AH1049445	
NAME <u>H [REDACTED] S [REDACTED]</u>	AGE <u>34</u>	
ADDRESS <u>[REDACTED] W. Flamingo Rd</u>	DATE <u>1-29-19</u>	
Rx		
<i>Pericet Sm</i>		
<i>Dose: xx (twenty) = 5 days</i>		
<i>Sig: q bid prn pain</i>		
<i>ICD-10: K04.7</i>		
NO REFILLS	DR. 	
Dr. Lic. No. 2032	DISPENSE ONLY AS WRITTEN <input type="checkbox"/>	

Script Back Image

No Back Image Available

Annotations

No Annotations

This report is considered a confidential Walgreens document. It is intended to be used for Board of Pharmacy/DEA audits. Professional discretion should be used prior to releasing this document.

Case No. 21-219-CS-S - 010

EXHIBIT 4

Case No. 21-219-CS-S

Robert E. Hill, DDS

TOTAL TIME SUMMARY

Case No. 21-219-CS-S – ROBERT E. HILL, DDS

Investigator Dena McClish – 1.08 @\$43.00/hr =	\$46.44
Attorney Peter Keegan – 9 hours @\$55.00/hr =	\$495.00
Board Coordinator Darlene Nases – 1.00 hours @\$21.00/hr =	\$21.00
Board Coordinator Kristopher Mangosing – 1.0 hours @31.86/hr =	\$31.86
<hr/>	
Total	\$594.30

Timesheet for Dena McClish

CONTROLLED SUBSTANCE EXPIRED CASES (TWENTY (20) PRESCRIBERS) – MULTIPLE CASE NUMBERS

DATE	TIME	Per Prescriber
------	------	----------------

10/2019 (multiple days)	15	0.75
-------------------------	----	------

Cross check report w/ license info, prepare excel worksheet, run prescriber PMPs, request and review prescription copies, ROI for **20 prescribers**

12/20/21	1.5	0.1
----------	-----	-----

Upload rx docs into InLumen for individual cases for **15 prescribers**

1/5/22	0.5	0.03
--------	-----	------

Conf call w/ counsel on **15 prescribers**

1/6/22	0.75	
--------	------	--

Research on RXs by **O'Connor**, email w/ DEA

1/25/22	0.5	
---------	-----	--

Phone w/ DEA re **O'Connor**, email to counsel & licensing

1/27/22	3	0.2
---------	---	-----

Update PMPs on **15 prescribers**, pull addt'l rxs, report to counsel for Bannen, Heeren, Martinez, Nguyen, Washington, request C&D from counsel

2/23/22 & 2/24/22	1	
-------------------	---	--

Bannen death cert research, pull & review pmp & Rx copy; contact pharmacy for fraud rx alers

TOTAL 22.25 hours x \$43/hour = \$956.75

Per Prescriber 1.08 Hours X \$43/hour = \$46.44

Timesheet for Peter Keegan – ROBERT E. HILL, DDS - CASE NO. 21-219-CS-S

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

1/7/2022	3.5
----------	-----

Review investigative file; legal research; discuss investigation with Board staff including Prescription Monitoring Program Manager Darla Zarley and General Counsel Brett Kandt; begin draft Notice of Intended Action and Accusation in Case No. 21-219-CS-S.

1/26/2022	1.5
-----------	-----

Finalize Notice of Intended Action and Accusation in Case No. 21-219-CS-S; proofread and submit to Board Coordination staff Shirley Hunting for mailing/service of process.

2/12/2022	0.5
-----------	-----

Confirm returned certified mailing of Notice of Intended Action and Accusation via USPS on February 12, 2022, for address no longer valid at 6800 W. Flamingo Road #11, Las Vegas, NV 89103

2/22/2022	1.0
-----------	-----

Attempt to contact Respondent Rajkamal Hansra at last known telephone number unsuccessfully. Contact Nevada Board of Dental Examiners to cross-reference possible contact options. Further attempts to contact Robert Hill, DDS were unsuccessful.

4/6/2022	1.5
----------	-----

Prepare Exhibit packet and review investigation; telephone/video conference with Investigator Dena McClish and Board staff to prepare for testimony at hearing. Prepare updated documentation of attorney's fees and recoverable costs

4/13/2022	1.0
-----------	-----

Prosecute hearing in Case 21-219-CS-S.

TOTAL 9 hours x \$55.00/hour = \$495.00

Timesheet for Kris Mangosing –

Board of Pharmacy v. Robert Hill, DDS - Case No. 21-219-CS-S

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

3/15/2022	0.50
-----------	------

Prepared and mailed out 21 day notice for hearing.

3/29/2022	0.50
-----------	------

Prepared documents for Board Meeting materials

TOTAL 1.00 hour x \$31.86/hour = \$ 31.86

Timesheet for Darlene Nases –

ROBERT HILL, DDS – CASE NO. 21-219-CS-S

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

2/10/22	1.0
---------	-----

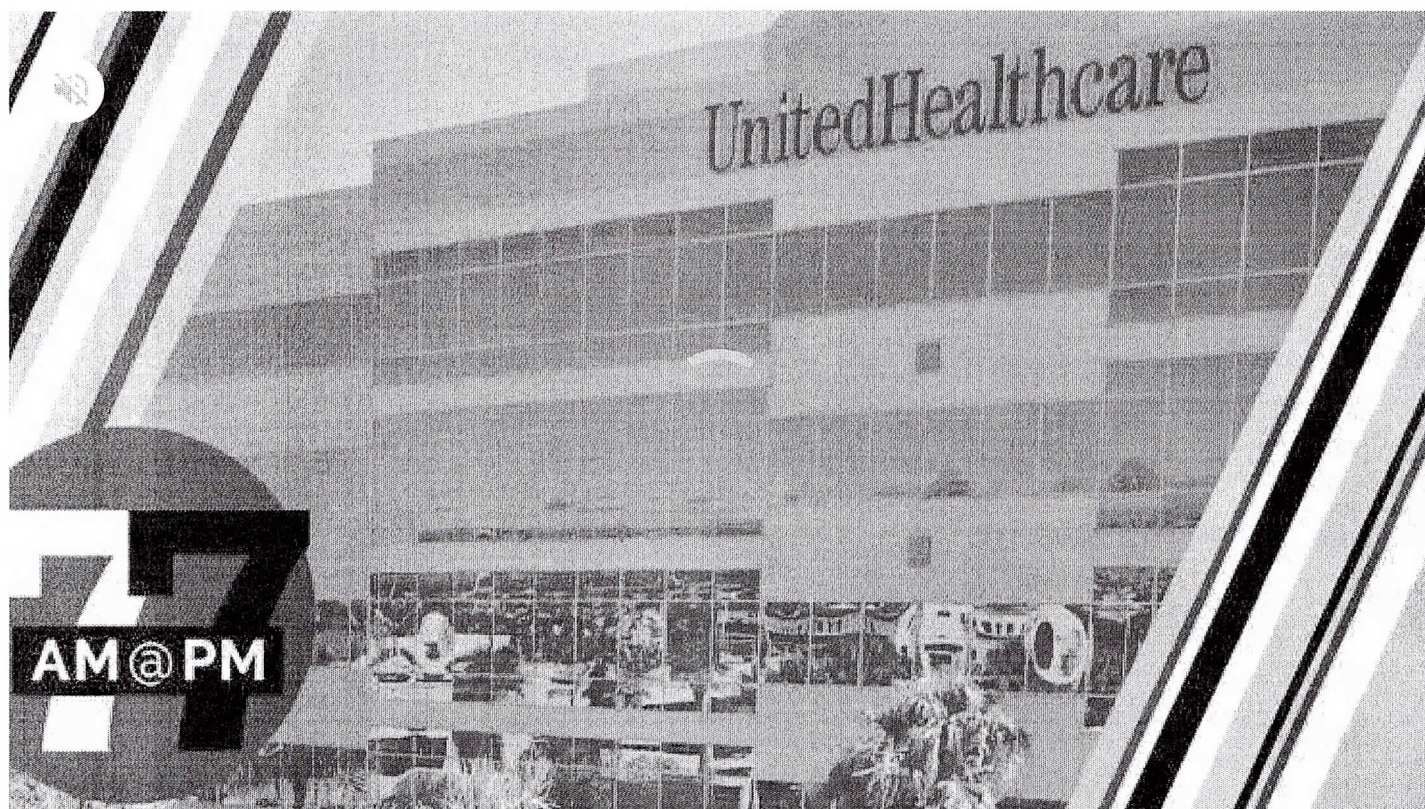
Prepare, certified, mailed, and tracked Cease & Desist and Notice of Intended Action and Accusation

TOTAL 1 hours x \$21/hour = \$21.00

SFY22 MONTHLY BUDGET REPORT
NEVADA STATE BOARD OF PHARMACY
CURRENT MONTH: Mar 22

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	\$ 2,400	\$ 1,525,938	\$ -	\$ 1,528,338	\$ 16,338
Registration Fees	\$ 668,834		\$ 668,834	\$ 132,550	\$ 971,450	\$ 50,000	\$ 1,154,000	\$ 485,166
Recovered Costs	\$ -	\$ 15,000	\$ 15,000	\$ 15,414	\$ 33,323	\$ 24,369	\$ 73,106	\$ 58,106
CC Processing Fees	\$ -	\$ 75,000	\$ 75,000	\$ 3,084	\$ 98,748	\$ 12,337	\$ 114,169	\$ 39,169
Change MGR RPH	\$ -	\$ 7,500	\$ 7,500	\$ 850	\$ 7,300	\$ 4,075	\$ 12,225	\$ 4,725
Inspections	\$ -	\$ 750	\$ 750	\$ 150	\$ 300	\$ 150	\$ 600	\$ (150)
Interest Income	\$ 15,000		\$ 15,000	\$ -	\$ 4,139	\$ 2,070	\$ 6,209	\$ (8,791)
Indirect Grant Income	\$ 2,670	\$ (2,670)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Late Fees	\$ 17,530		\$ 17,530	\$ 415	\$ 16,825	\$ 1,660	\$ 18,900	\$ 1,370
Unclaimed Property Refund	\$ -	\$ 28,050	\$ 28,050	\$ -	\$ 28,050	\$ -	\$ 28,050	\$ -
Total Revenues	\$ 6,483,596	\$ 249,570	\$ 6,733,166	\$ 154,863	\$ 7,079,575	\$ 94,660	\$ 7,329,099	\$ 595,933
EXPENSES								
Payroll	\$ 3,340,540		\$ 3,340,540	\$ 285,875	\$ 2,096,018	\$ 851,135	\$ 3,233,028	\$ (107,512)
Operating	\$ 825,000		\$ 825,000	\$ 39,807	\$ 460,238	\$ 186,917	\$ 686,962	\$ (138,038)
Equipment	\$ 30,000		\$ 30,000	\$ 1,105	\$ 13,317	\$ 15,578	\$ 30,000	\$ -
In-State Travel	\$ 110,000		\$ 110,000	\$ 10,858	\$ 39,766	\$ 20,444	\$ 71,068	\$ (38,932)
Out-of-State Travel	\$ 65,000		\$ 65,000	\$ -	\$ 2,504	\$ 35,000	\$ 37,504	\$ (27,496)
DAG Cost	\$ 12,000		\$ 12,000	\$ 2,649	\$ 6,895	\$ 3,801	\$ 13,345	\$ 1,345
Aid for Education	\$ 2,000		\$ 2,000	\$ -	\$ -	\$ -	\$ -	\$ (2,000)
Reserve	\$ 2,099,056	\$ 249,570	\$ 2,348,626	\$ -	\$ -	\$ -	\$ 3,257,192	\$ 908,566
Total Expenses	\$ 6,483,596	\$ 249,570	\$ 6,733,166	\$ 340,294	\$ 2,618,738	\$ 1,112,874	\$ 7,329,099	\$ 595,933
Balance	\$ -	\$ -	\$ -				\$ -	\$ -

New COVID-19 therapeutic drugs may be game-changers



New COVID treatment drug remains scarce in Las Vegas

By Mary Hynes Las Vegas Review-Journal

March 14, 2022 - 5:01 am



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Updated March 14, 2022 - 7:37 am

Henderson resident Jullie Hoggan knew a free COVID-19 drug existed that could transform her life. Her challenge would be to find it.

In December, the U.S. Food and Drug Administration had authorized AstraZeneca's Evusheld for emergency use in preventing COVID-19 in those with a compromised immune system, such as Hoggan. Drugs the 50-year-old takes to suppress her immune system after a kidney transplant place her at high risk for the disease.

Using the federal government's online tool for locating COVID-19 therapeutics, she found an at-home-infusion company in Southern Nevada that said it would charge her \$1,000 to administer the IV injection of monoclonal antibodies. The therapy, according to the government, is available to patients for free.

She wrote letters to the governor and state health department.

"Look, we the patients can't get this stuff," she recalls telling them. "Like, we're trying. ... We can't get it. And I know it's here."

In response, the state pharmacy board delivered Evusheld to her doctor's office free of charge in late January.

Since then, connecting patients with new therapeutics has gotten easier. A month ago, the state of Nevada opened a treatment center in Las Vegas for administering Evusheld and monoclonal antibody treatments Sotrovimab and Bebtelovimab. A state hotline now connects patients with telehealth providers who can prescribe treatment.

Meanwhile, the Southern Nevada Health District has begun to dispense antiviral pills, such as Paxlovid and Molnupiravir, for treating COVID-19. Both the monoclonal antibody treatments and the antivirals need to be taken early on in an infection.

Except for Evusheld, which prevents disease, these other therapeutics are authorized for emergency use in treating people with mild to moderate COVID-19 and are aimed at keeping them out of the hospital. They are reserved for those at high risk for progression to severe illness due to age (65 and older) or an underlying health condition, such as heart or lung disease, diabetes or obesity.

The state has authorized spending \$19 million to provide the therapeutics free in Nevada. They are still under study and have not received full approval

from the FDA.

The supply of the new drugs remains limited, though some authorities say the larger issue is that of getting available supplies to the people who need them the most.

‘Huge bottleneck’ for drug

Of the new treatments, Pfizer’s Paxlovid has shown the greatest effectiveness in studies, reducing hospitalizations and deaths by 88 percent. A course of the antiviral medication needs to begin within five days of the onset of symptoms.

The FDA authorized its use for both adults and children 12 and older weighing at least 88 pounds. A benefit is the ease of administering the medication, a combination of two different pills that can be taken at home. Providers need to use caution in prescribing the Paxlovid because it can interact with other common medications.

“I would love for everybody to get Paxlovid,” said Dr. Jason Dazley, an infectious disease specialist with the VA Southern Nevada Healthcare System. “The problem we’re seeing is there’s a huge bottleneck in accessibility on that one.”

Dazley said he could prescribe twice as much of the drug as it currently available.

Another antiviral pill available for out-patient use, Molnupiravir, developed by Merck and Ridgeback Biotherapeutics, was found to reduce hospitalizations and deaths by 30 percent. The FDA authorized the medication only for adults at risk for progressing to severe COVID-19 for whom alternative authorized treatments are inaccessible or medically inappropriate.

There are also two new monoclonal antibody therapies that have been found to be effective against the omicron variant, which caused the latest wave of COVID-19 that is now subsiding across the country.

Sotrovimab, developed by GlaxoSmithKline and Vir Biotechnology and authorized for both adults and children, has been found to reduce hospitalizations and deaths by 79 percent. It should be given as soon as possible after a positive test and within seven days of symptom onset.

A second monoclonal antibody treatment, Bebtelovimab by Eli Lilly and Co., was found to improve symptoms and reduce viral load. The FDA has authorized its emergency use for adults and children when other authorized treatments are inaccessible or inappropriate.

“We don’t have really good data behind that one,” said Dazley, who at this point is not prescribing Bebtelovimab. However, early data suggests it might be more effective against the omicron subvariant known as BA.2, he said.

Monoclonal antibody treatments from earlier in the pandemic are no longer in use because they did not work against the omicron variant, health authorities say.

The local VA is not yet equipped to administer Evusheld, the pre-exposure preventive medication, Dazley said.

Centralized treatment center opens

The Las Vegas treatment center, on Harmon Avenue near the Strip, offers monoclonal antibody therapeutics Evusheld, Sotrovimab and Bebtelovimab.

The center’s medical team can evaluate patients for possible treatment, and physicians can prescribe treatment for their patients, said Dr. Rashid Chotani, global medical director for AshBritt/IEM Health, which operates the Las Vegas center and similar centers across the country.

The center has at its disposal 500 courses of treatments per week, five or more times the amount it needs for current patient volumes.

The treatments are provided to patients free, without requiring evidence of insurance or documentation of immigration status, said Chotani, noting that the center has bilingual staff members.

“Problem is that a lot of people are afraid to come to a facility, you know, whether it is (for) a vaccine or testing or a monoclonal antibody infusion,” he said.

The treatments can provide peace of mind to a person at risk of severe COVID-19, he said. And receiving Evusheld can be life-changing for an immunocompromised person.

“I’m not saying these people can go wild and have parties,” he said. “But now they don’t have to be completely restricted and live in a bubble.”

Hoggan, the kidney transplant patient, did not develop any antibodies to ward off COVID-19 until she’d received four doses of vaccine. Two weeks after her first shot of Evusheld, testing showed that her antibodies had doubled, she said.

Patients are now recommended to receive not one but two shots of Evusheld. Following her second shot, administered at the Las Vegas treatment center, Hoggan said she experienced a new-found sense of freedom, having spent much of the pandemic restricted to her house, interacting with few people other than her husband and daughter.

Last weekend, she celebrated her 50th birthday by having a few friends over to spend time in her backyard.

Even better, they didn’t wear masks.

‘Not getting the uptake’

The Southern Nevada Health District has ample supplies of the antiviral pills Paxlovid and Molnupiravir, the former in short supply at Nevada pharmacies.

As of a week ago, it had distributed just 20 courses of Paxlovid and has several hundred courses on hand, said Dr. Cort Lohff, chief medical officer for the health district.

“We’re not getting the uptake we had hoped to see, certainly,” he said. “I’m not worried about exhausting our supplies,” but about getting medication to those in need.

Patients who have tested positive for COVID-19, either through a PCR test or through an at-home rapid test, can be evaluated at the health district for possible treatment. Lohff said that at-risk patients with symptoms of COVID-19 should get tested and evaluated as soon as possible.

“The Health District has a provider on stand-by to do a virtual consult with patients,” according to district representative Jennifer Sizemore.

A patient’s doctor can provide a prescription for an antiviral to the district’s pharmacy.

“My hope is that people will come to understand that this is obviously a much better option than getting a serious illness, or having to go to the hospital or even dying of this disease,” Lohff said.

This concept is not lost on Hoggan, who said she’d seek testing and treatment right away if she does develop symptoms.

If she tests positive, she said she’ll contact the Las Vegas treatment center about possibly getting Sotrovimab.

“I know I can call there, and they’ll be, like, ‘yes, you can come,’ instead of ‘maybe in a couple of weeks we’ll be able to get this to you,’” she said. “And

that might be too late.”

Contact Mary Hynes at mhynes@reviewjournal.com or 702-383-0336.

Follow @MaryHynes1 on Twitter.

Resources

State website: Information on COVID-19 treatment options and eligibility can be found at nvhealthresponse.nv.gov/find-treatment.

State call center: To discuss therapeutic options, call 800-401-0946 between 7 a.m. and 8 p.m. seven days a week.

Las Vegas treatment center: Open seven days a week from 8:30 a.m. to 4:30 p.m. at 150 E. Harmon Ave. Appointments can be made by physician referral, by calling 702-481-4209, and on a walk-in basis.

Southern Nevada Health District: Appointments for COVID-19 testing can be scheduled by calling 702-759-1354.

Those in need of a test, as well as those who have a positive test result and seek evaluation for a therapeutic, may go to the testing site at the district's main location, 280 S. Decatur Blvd. Hours: 6 a.m. to 2:30 p.m. Monday through Friday.

Those who already have a prescription for a COVID-19 antiviral medication can go to the health district pharmacy at the main location. Pharmacy hours are 8:30 a.m. to 5:30 p.m. Monday through Thursday, and 8:30 a.m. to 5 p.m. on Friday.

Section 3 of this regulation provides that the dispensing practitioners of an oncology group practice registered with the Board are jointly responsible for ensuring compliance with certain requirements relating to dispensing dangerous drugs.

Section 1. Chapter 639 of NAC is hereby amended by adding thereto a new section to read as follows:

1. *An oncology group practice that wishes to maintain a single inventory of dangerous drugs, not including compounded drug products, received at a site of practice in lieu of maintaining separate inventories for each dispensing practitioner of the oncology group practice must apply to the Board on an application provided by the Board for a certificate of registration and submit the fee prescribed in NAC 639.220 for authorization of a practitioner, other than a licensed veterinarian, to dispense dangerous drugs. An oncology group practice must submit a separate application and fee for each site of practice at which the oncology group practice wishes to maintain a single inventory of dangerous drugs.*
2. ~~*[Upon receipt of a completed application and fee, the]*~~ *The Board will issue a certificate of registration to an oncology group practice if the application for a certificate of registration is approved and the requisite fee is paid. [A certificate of registration is valid for 2 years after the date on which the certificate is issued by the Board, unless an oncology group practice renews its registration.]*
3. *To renew a certificate of registration, an oncology group practice must submit to the Board another completed application and the fee prescribed in NAC 639.220 for biennial renewal of authorization of a practitioner, other than a licensed veterinarian, to dispense dangerous drugs.*
4. *A certificate of registration issued pursuant to this section:*
 - (a) *Entitles the oncology group practice to maintain a single inventory of dangerous drugs, not including compounded drug products, at the site of practice for which the oncology group practice received certification.*