UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

ELI LILLY AND COMPANY Plaintiff, v. WELLS PHARMACY NETWORK, LLC, Defendant.	Case No.

COMPLAINT

Plaintiff Eli Lilly and Company ("Plaintiff" or "Lilly"), brings this action against Defendant Wells Pharmacy Network ("Defendant" or "Wells") and alleges the following:

I. NATURE OF THE ACTION

1. Lilly brings this action to stop Defendant from unlawfully manufacturing and selling unapproved new drugs. Florida state laws require drug manufacturers to demonstrate their drugs are safe and effective in order to obtain regulatory approval to market them. Defendant violates these laws by marketing and selling unapproved new drugs throughout Florida and throughout the United States.

A. Florida Laws Against Unlawful and Unfair Business and Trade Practices

2. Florida's Deceptive and Unfair Trade Practices Act ("FDUTPA") "protect[s] the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce." Fla. Stat. § 501.202(2). FDUTPA further forbids Defendant from violating "[a]ny law, statute, rule, regulation, or ordinance which proscribes unfair methods of competition, or unfair, deceptive, or unconscionable acts or practices." Fla. Stat. § 501.203(3)(c).

B. Florida Laws Prohibiting the Sale of Unapproved Drugs

3. Florida regulates the manufacture and sale of prescription drugs under the state's Drug and Cosmetic Act. As relevant here, the Florida Drug and Cosmetic Act specifies that no person may "sell, offer for sale, hold for sale, manufacture, repackage, distribute, or give away any new drug unless an approved application has become effective under s. 505 of the [Federal Food, Drug, and Cosmetic Act] or otherwise permitted by the Secretary of the United States Department of Health and Human Services for shipment in interstate commerce." Fla. Stat. § 499.023. Florida's drug-approval provision is designed to ensure that when Floridians are treated with prescription drugs, they can rest assured that the products are safe and effective for their intended uses.

4. Defendant disregards these and other state laws respecting the distribution of unapproved drugs. Rather than invest the time and resources

necessary to research, develop, and test its products in order to ensure that they are safe and effective and to obtain regulatory approval to market them, Defendant is simply creating, marketing, selling, and distributing unapproved new drugs for unapproved uses throughout Florida and the rest of the United States.

D. The Importance of Drug Approval and the Purpose of this Action

5. Defendant's business model is unlawful. Defendant is engaged in unlawful and unfair business and trade practices because Defendant manufactures and dispenses drugs in violation of the Florida Drug and Cosmetic Act, which prohibits the sale of drugs not approved by FDA.

6. Testing new drugs and obtaining the legally required regulatory approval to sell them is time-consuming and very costly. Ignoring drug-approval requirements provides Defendant an unfair competitive advantage over law-abiding pharmaceutical manufacturers like Lilly. Worse, it puts patients at risk by exposing them to drugs that have not been shown to be safe or effective.

7. Federal and state law require approval for new drugs for good reason. Drug approval is evidence-based, and it is essential to ensure the quality, safety, and effectiveness of new drugs. When companies circumvent the drug-approval process, safety and efficacy are, at best, unknown. The danger is not merely theoretical, as manufacturing and distribution of unapproved new drugs of unknown quality has endangered or adversely impacted public health. For example, in 2012, nearly 800

patients in 20 states were diagnosed with a fungal infection after receiving injections of an unapproved preservative-free methylprednisolone acetate drug manufactured in Massachusetts. Of those 753 patients, the U.S. Centers for Disease Control and Prevention reported that 64 patients in nine states died, though other sources report the death toll as exceeding 100 victims. Other adverse events related to the sale of unapproved and unsafe drugs have occurred in the years following 2012.

8. Lilly brings this action under FDUTPA to stop Defendant from unlawfully manufacturing, marketing, selling, and distributing unapproved new drugs. Lilly seeks a declaration that Defendant's business practices violate FDUTPA by manufacturing, distributing, and selling unapproved new drugs and an injunction prohibiting Defendant from committing such violations. Fla. Stat. §§ 499.023, 501.211(1).

9. Lilly also seeks attorney's fees and court costs. *See* Fla. Stat. § 501.211(2).

THE PARTIES

10. Lilly is a corporation organized and existing under the laws of the State of Indiana, with a principal place of business in Indiana.

11. Lilly markets and sells Mounajro®, which contains the active pharmaceutical ingredient tirzepatide. Mounjaro® is the only FDA-approved drug containing tirzepatide as its active pharmaceutical ingredient.

12. Plaintiff sells Mounjaro® to medical facilities and customers across the United States, including in Florida.

13. Plaintiff has invested significant time and resources to research, develop, manufacture, and test Mounjaro® in order to obtain regulatory approval from FDA to market it as a treatment for type 2 diabetes mellitus.

14. Defendant is a limited liability company organized and existing under the laws of Florida, with its principal place of business at 3420 Fairlane Farms Road, Suite 300, Wellington, Florida. Defendant manufactures its unapproved drug products in this judicial district at 1210 SW 33rd Ave., Ocala, Florida.

15. Upon information and belief, all members of Defendant are citizens of Florida. The Florida Secretary of State's records list William E McMillen as Defendant's manager/member. According to an Accurint® background report, Mr. McMillen resides in Boca Raton, in Palm Beach County, Florida.

16. Defendant markets itself as shipping products throughout the United States, including Florida. Defendant sells its unapproved drug products throughout the United States, including in this judicial District. The unapproved drug products Defendant manufactures in this judicial District and offers for sale and ships throughout the United States include unapproved drugs, some of which, Defendant represents, contain tirzepatide.

II. JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction under 28 U.S.C. § 1332. The parties are citizens of different States (¶¶ 10–16, *supra*), and the matter in controversy exceeds the sum or value of $75,000, exclusive of interest and costs.

18. This Court has personal jurisdiction over Defendant. Defendant manufactures its unapproved drugs in this District and ships them across the United States from this District. Plaintiff's claims arise out of or relate to Defendant's activities in this District.

19. Venue in this District is proper under 28 U.S.C. § 1391(b).

III. FACTUAL ALLEGATIONS

A. Plaintiff Sells the only Tirzepatide Drug Approved by FDA for Sale in the United States

20. Plaintiff sells Mounjaro® pursuant to New Drug Application #NDA 215866, which FDA approved on May 13, 2022, as a treatment for type 2 diabetes.

21. Plaintiff is the only supplier of FDA-approved tirzepatide drugs in the United States.

B. Defendant's Activities Violate Florida Laws Against Selling Unapproved Drugs

1. Florida laws require Drug Approval

22. Defendant's manufacturing, marketing, sale, and distribution of unapproved new drugs is unlawful.

23. Under the laws of Florida, a new drug may not be introduced or delivered for introduction into interstate or intrastate commerce unless an application approved under section 505 of the federal act is in effect for the drug. *See* Fla. Stat. § 499.023.

24. Florida's Drug and Cosmetic Act provides that no person may "sell, offer for sale, hold for sale, manufacture, repackage, distribute, or give away any new drug unless an approved application has become effective under s. 505 of the federal act or unless otherwise permitted by the Secretary of the United States Department of Health and Human Services for shipment in interstate commerce." *Id*.

25. Defendant does not have an approved New Drug Application or Abbreviated New Drug Application for any drug product purporting to contain tirzepatide.

26. Defendant is violating FDUTPA because (i) it is selling its unapproved tirzepatide drugs nationwide, including from Florida to customers in Florida (and throughout the United States); and (ii) it has not obtained the approval of any relevant regulatory authority to introduce into any state, or into interstate commerce generally, the unapproved drug purporting to contain tirzepatide that it manufactures, markets, sells, and distributes.

C. Defendant's business and trade practices jeopardize public health

27. Defendant's unfair competition jeopardizes public health. FDA has stated that unapproved drugs pose a higher risk to patients than FDA-approved drugs because they have not undergone FDA premarket review for safety, effectiveness, and quality. FDA's *Guidance for Industry, Prescription Requirement Under Section 503A of the Federal Food, Drug, and Cosmetic Act* at 4 (December 2016). "Compounded drugs are not FDA-approved, and the agency does not verify the safety or effectiveness of compounded drugs." FDA's *Medications Containing Semaglutide Marketed for Type 2 Diabetes or Weight Loss* (May 31, 2023). "Purchasing medicine online from unregulated, unlicensed sources can expose patients to potentially unsafe products that have not undergone appropriate evaluation or approval, or do not meet quality standards." *Id.*

28. Defendant sells its unapproved drugs, including its purported tirzepatide drug, without any assurances of the drug's identity, strength, quality and purity.

29. Defendant manufactures its drugs under dangerous conditions, failing to follow the procedures necessary to prevent its drugs from being contaminated and subjecting patients to increased risk. FDA has observed that Defendant has: recalled all drugs prepared during a nearly seven month period in 2016 for lack of sterility assurance (Exhibit A, September 20, 2016 recall notice); "used a non-pharmaceutical grade component in the formulation of a drug product" (Exhibit B, 2018 Form 483);

had "actionable microbial contamination . . . present . . . during aseptic production" (Exhibit C, 2016 Form 483); "continued producing sterile drug products while construction was ongoing within [its] facility without establishing adequate controls to prevent contamination of the production environment (*Id.*); and had "dead insects and fungal growth …[observed] in the ISO 7 annex room during cleaning" the day after the room had (supposedly) been cleaned (*Id.*).

30. Moreover, Defendant was warned by FDA that it was filling prescriptions without receiving valid prescriptions for individually-identified patients for a portion of the drug products it was producing, resulting in Defendant's drugs being considered unapproved and misbranded. (Exhibit D, 11/10/14 Warning Letter).

D. Plaintiff has been Injured by Defendant's Unlawful and Unfair Competition

31. Defendant's actions have injured Plaintiff. Plaintiff is the only supplier in the United States of FDA-approved tirzepatide drugs.

32. Defendant sells its unapproved drugs purporting to contain tirzepatide to customers in Florida and throughout the United States. Some sales made by Defendant in each of these states would have been made by Plaintiff, but for Defendant's unlawful and unfair competition, and Plaintiff has suffered financial harm as a direct result of Defendant's unlawful and unfair competition.

33. As a result of Defendant's unlawful and unfair competition as described above, Plaintiff has suffered financial harm. Defendant's unlawful sales of its purported tirzepatide drug are also injuring the reputation of Plaintiff because of Defendant's business and trade practices that jeopardize public health.

IV. CAUSES OF ACTION

COUNT ONE

(Violation of Florida Deceptive and Unfair Trade Practices Act ("FDUTPA"), Fla. Stat. § 501.201, *et seq)*

34. Plaintiff realleges and incorporates by reference each and every allegation set forth in paragraphs 1-33, above, as if fully stated herein.

35. FDUTPA makes unlawful "unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce." Fla. Stat. § 501.204(1).

36. FDUTPA also creates a cause of action for "anyone aggrieved" by a violation of FDUTPA to bring an action against "a person who has violated, is violating, or is otherwise likely to violate" the Act. Fla. Stat. § 501.211.

37. Plaintiff is "aggrieved" under FDUTPA.

38. Defendant is a "person" who has violated and is violating FDUTPA.

39. Defendant engages in unfair, unconscionable, and deceptive conduct in "trade" and "commerce" in violation of FDUTPA when it unlawfully manufactures

and sells unapproved drugs in Florida, including its unapproved new drugs purporting to contain tirzepatide.

40. Given that Defendant's drugs are unapproved (and therefore pose potential harm to consumers), Defendant's manufacture and sale of its drugs is a practice that is immoral, unethical, oppressive, unscrupulous, and/or substantially injurious to physicians, medical facilities and patients alike.

41. The practices described herein also offend established public policy regarding the protection of consumers against companies, like Defendant, that engage in unfair methods of competition. Defendant's conduct has caused financial harm to Plaintiff that is not outweighed by countervailing benefits to any consumers or competition.

42. Consumers in Florida who unwittingly purchased Defendant's illegal new drugs purporting to contain tirzepatide were deceived about the lawfulness of Defendant's product and deprived of the benefit of their bargain.

43. Defendant's business acts and practices are also unfair because they have caused harm and injury-in-fact to Lilly for which Defendant has no justification other than to increase, beyond what Defendant would have otherwise realized, its market share and revenue from the sale of unapproved drugs.

44. Defendant has further violated FDUTPA by violating a "statute . . . which proscribes unfair methods of competition, or unfair, deceptive, or

unconscionable acts or practices." Fla. Stat. 501.203(3)(c). Here, Defendant violated Florida's Drug and Cosmetic Act which proscribes certain unconscionable acts and practices.

45. In addition to injury in excess of $75,000, Plaintiff is entitled to declaratory and injunctive relief, the value of which exceeds $75,000, as well as reasonable attorney's fees and costs pursuant to Fla. Stat. §§ 501.2105, 501.211.

V. CONCLUSION AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in its favor:

1. A permanent injunction enjoining Defendant from continuing the unlawful and unfair business practices alleged in this complaint, which injunction has a value to Plaintiff in excess of $75,000;

2. A judgment that Defendant violated FDUTPA;

3. Declaratory relief;

4. Attorney's fees and costs incurred in this action; and

5. Any further relief the Court may deem just and proper.

Dated: September 19, 2023

Respectfully submitted,

KING & SPALDING LLP

/s/ Brian P. Miller
Brian P. Miller
Lead Counsel
Florida Bar No. 0980633
bmiller@kslaw.com
Southeast Financial Center
200 S Biscayne Boulevard
Suite 4700
Miami FL 33131
Telephone: (305) 462-6000
Facsimile: (305) 462-6100

Attorneys for Plaintiff
Eli Lilly and Company

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Eli Lilly and Company

(b) County of Residence of First Listed Plaintiff Marion County, Indiana
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Brian P. Miller, King & Spalding LLP, Southeast Financial Center, 200 S Biscayne Boulevard, Suite 4700, Miami, FL 33131. (305) 462-6028

DEFENDANTS

Wells Pharmacy Network, LLC

County of Residence of First Listed Defendant Marion County, Florida
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☒ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☒ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☒ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☒ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
28 U.S.C. § 1332

Brief description of cause:
Violation of Florida Deceptive and Unfair Trade Practices Act

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ injunction

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE
Sep 19, 2023

SIGNATURE OF ATTORNEY OF RECORD
/s/ Brian P. Miller

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

Eli Lilly and Company

Plaintiff(s)

v.

Wells Pharmacy Network, LLC

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Wells Pharmacy Network, LLC
by and through its registered agent, William E. McMillen
3420 Fairlane Farms Road, Suite 300
Wellington, FL 33414

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Brian P. Miller
Bar No. 0980633
King & Spalding LLP
Southeast Financial Center, 200 S Biscayne Boulevard, Suite 4700
Miami, FL 33131
(305) 462-6028

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

EXHIBIT A

Company Announcement

When a company announces a recall, market withdrawal, or safety alert, the FDA posts the company's announcement as a public service. FDA does not endorse either the product or the company.

Wells Pharmacy Network Issues Voluntary Nationwide Recall of Sterile Products due to Concern for Lack of Sterility Assurance

For Immediate Release

September 20, 2016

Contact

Consumers

Quality Hotline
WPNQuality@wellsrx.com
(800) 794-2360

Media

MediaInquires@wellsrx.com

Announcement

Ocala, Florida – Wells Pharmacy Network (“WPN”) is voluntarily recalling all sterile human and veterinary products prepared between February 22, 2016 and September 14, 2016, and that remain within expiry (list below) due to the Food and Drug Administration’s (“FDA”) concern over a lack of sterility assurance.

Administration of a drug product intended to be sterile that has microbial contamination may result in infections that may be serious and life-threatening.

The recalled products were used for a variety of indications. NO VIAL OR PORTION OF ANY LOT OF THESE MEDICATIONS HAS BEEN FOUND TO BE NON STERILE. All recalled products have a label that includes the name Wells Pharmacy Network, logo, drug name, and expiration date. If unsure, Customers can call the pharmacy to determine if their product is on the list. To date, no adverse events have been reported.

WPN takes the utmost care to ensure patient safety. All patients and providers that received any sterile compounded products prepared between February 22, 2016 and September 14, 2016, and that remain within expiry, should take the following actions:

- Discontinue use of the products;
- Quarantine any unused product until further instructions are received on how to return the product; and
- Contact WPN at the Quality hotline at (800) 794-2360 Monday through Friday, between 9:00 am and 6:00 pm EST or email at WPNQuality@wellsrx.com to discuss the return of any unused sterile product.

Customers with questions regarding this recall can contact WPN at the Quality hotline at (800) 794-2360 Monday through Friday between 9:00 am and 6:00 pm EST or email at WPNQuality@wellsrx.com. Customers should contact their physician, healthcare provider, or veterinarian if they have experienced any problems that may be related to using these products. Providers who have dispensed any sterile products prepared between February 22, 2016 and September 14, 2016 to a patient(s) for use outside of the provider's office should contact the patient(s) to whom product was dispensed and advise the patient(s) of this recall.

Adverse reactions or quality problems experienced with the use of these products in humans or animals may be reported to FDA in the following ways:

- For adverse events in Humans please use FDA's MedWatch Adverse Event Reporting program either online, by regular mail or by fax.
  - Complete and submit the report Online: www.fda.gov/medwatch/report.htm
  - Regular Mail or Fax: Download form www.fda.gov/MedWatch/getforms.htm or call 1-800-332-1088 to request a reporting form, then complete and return to the address on the pre-addressed form, or submit by fax to 1-800-FDA-0178
- For reporting animal adverse drug events, please follow the link to the FORM FDA 1932a found at: http://www.fda.gov/AnimalVeterinary/SafetyHealth/ReportaProblem/ucm055305.htm

This recall is being conducted with the knowledge of and in cooperation with the FDA.

Again, WPN's primary concern is your safety and WPN is taking this action out of an

abundance of caution. Thank you for your support.

List of products to be recalled:

Drug	Lot #	Animal Type
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	03282016@10	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	03282016@16	Human
ULTRA-TEST 250 (CYP 80%/PROP 20%) 250MG/ML INJECTABLE	03282016@22	Human
TESTOSTERONE ENANTHATE-GRAPESEED OIL 200MG/ML INJECTABLE	03282016@3	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	03282016@6	Human
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	03292016@12	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	03292016@3	Human
MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	03292016@5	Human
NICOTINAMIDE ADENINE DINUCLEOTIDE (NADH) - LYOPHILIZED (P.F.) 100MG INJECTABLE	03302016@13	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	03302016@4	Human
ULTRA-TEST 200 (8ML) GRAPESEED OIL (CYP 90%/PROP 10%) 200MG/ML INJECTABLE	03302016@5	Human
TESTOSTERONE ENANTHATE-GRAPESEED OIL 200MG/ML INJECTABLE	03302016@6	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	03302016@8	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML) 15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	03302016@9	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	03312016@1	Human
ALPROSTADIL - (5ML) 20MCG/ML INJECTABLE	03312016@6	Human
TRIMIX - (10ML) 30MG / 2MG / 20MCG INJECTABLE	03312016@7	Human
QUAD2 (5ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	03312016@8	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (10ML) 210MG/ML INJECTABLE	03312016@9	Human
TESTOSTERONE CYPIONATE/ZINC SULFATE IN GRAPESEED 200MG/200MCG/ML INJECTABLE	04012016@2	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	04012016@4	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	04012016@7	Human

TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	04012016@9	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	04042016@10	Human
TESTOSTERONE PROPIONATE 100MG/ML INJECTABLE	04042016@2	Human
TRIMIX WITH ATROPINE (2ML) 30MG/3MG/150MCG/0.2MG/ML INJECTABLE	04042016@22	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	04042016@30	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	04042016@7	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	04052016@1	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 50MG/ML INJECTABLE	04052016@4	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	04052016@5	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	04062016@106	Human
SERMORELIN ACETATE/GHRP (2) 6MG/4.5MG KIT	04062016@170	Human
LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	04062016@3	Human
SODIUM BICARBONATE, MDV 8.4% INJECTABLE	04062016@4	Human
METHYLCOBALAMIN - 10ML 1,000MCG/ML INJECTABLE	04062016@5	Human
HISTRELIN ACETATE, LYOPHILIZED 5.5MG INJECTABLE	04062016@6	Vet
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	04062016@7	Human
TRI1 - NR (2ML) 3.6MG/0.4MG/0.04MG INJECTABLE	04072016@10	Human
TRIMIX - (10ML) 30MG / 1MG / 10MCG INJECTABLE	04072016@13	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML) 15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	04072016@15	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/9MG/9MG KIT	04072016@19	Human
QUAD4 (2ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	04072016@8	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	04072016@85	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	04082016@3	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	04082016@4	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	04082016@6	Human
PROGESTERONE IN SESAME OIL 150MG/ML INJECTABLE	04082016@7	Vet
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	04112016@10	Human
TRIMIX WITH ATROPINE (10ML) 30MG/3MG/150MCG/0.2MG/ML		

INJECTABLE	04112016@13	Human
NANDROLONE DECANOATE (H) 200MG/ML INJECTABLE	04112016@16	Human
VITAMIN D3 IN SESAME OIL (5ML) 100,000 IU/ML INJECTABLE	04112016@23	Human
TRIMIX / ATROPINE (10ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	04112016@6	Human
TRI2 - NR (5ML) 30MG/3MG/0.3MG INJECTABLE	04112016@8	Human
TESTOSTERONE CYPIONATE/ANASTROZOLE 200MG/1MG/ML INJECTABLE	04122016@1	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	04122016@17	Human
TRIMIX (10ML) 30MG/3MG/100MCG INJECTABLE	04122016@18	Human
TRI1 - NR (5ML) 3.6MG/0.4MG/0.04MG INJECTABLE	04122016@19	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	04122016@2	Human
TRI-TEST 200 (CEP) 200MG/ML INJECTABLE	04122016@4	Human
MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	04122016@76	Human
TESTOSTERONE ENANTHATE-GRAPESEED OIL 200MG/ML INJECTABLE	04132016@1	Human
TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	04132016@14	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	04132016@32	Human
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	04132016@69	Human
TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	04132016@8	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 3,500 UNIT VIAL VIAL	04132016@91	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 20,000 UNIT VIAL VIAL	04132016@96	Human
MITOMYCIN SOLUTION, STERILE 0.02% (200MCG/ML) OPHTHALMIC	04142016@107	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	04142016@112	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	04142016@14	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	04142016@15	Human
QUAD4 (5ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	04142016@16	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	04142016@2	Human
SERMORELIN ACETATE 28MG KIT	04142016@28	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL VIAL	04142016@34	Human
SERMORELIN ACETATE 15MG KIT	04142016@43	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 20MG/ML		

INJECTABLE	04142016@5	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	04142016@7	Human
SERMORELIN ACETATE/GHRP (2) 9MG/3MG KIT	04152016@149	Human
ULTRA-TEST 200 - (10ML VIAL) 200MG/ML INJECTABLE	04152016@2	Human
SERMORELIN ACETATE/GHRP (2) 9MG/9MG KIT	04152016@21	Human
METHYLCOBALAMIN 5,000MCG/ML INJECTABLE	04152016@3	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	04152016@5	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	04182016@10	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	04182016@33	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	04182016@37	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	04182016@4	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	04182016@49	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	04182016@6	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	04192016@5	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO * (10ML)*12.5/25/25/25/12.5/0.2/20MG/ML INJECTABLE	04192016@7	Human
METHIONINE/INOSITOL/CHOLINE+B12(M) + CARNITINE 12.5MG/50MG/100MG/1MG/50MG/MLINJECTABLE	04192016@8	Human
VITAMIN D3 IN SESAME OIL 50,000 IU/ML INJECTABLE	04202016@1	Human
ULTRA-TEST 200 (8ML) GRAPESEED OIL (CYP 90%/PROP 10%) 200MG/ML INJECTABLE	04202016@2	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	04202016@4	Human
MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	04202016@5	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	04202016@56	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE, LYOPHILIZED 15MG/5.4MG/75MG VIAL	04202016@8	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 20MG INJECTABLE	04212016@149	Human
TRIMIX - (5ML) 30MG / 1MG / 10MCG INJECTABLE	04212016@17	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	04212016@19	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 100MG/ML INJECTABLE	04212016@5	Human
SERMORELIN ACETATE 9MG KIT	04212016@55	Human

QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	04222016@10	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	04222016@4	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 50MG/ML INJECTABLE	04222016@6	Human
ALPROSTADIL 20MCG/ML INJECTABLE	04222016@8	Human
QUAD2 (2ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	04222016@9	Human
CHORIONIC GONADOTROPIN + B12, LYOPHILIZED 10,000 UNIT VIAL VIAL	04252016@168	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	04252016@17	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	04252016@2	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	04252016@21	Human
LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	04252016@4	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 7,500 UNIT VIAL VIAL	04262016@25	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	04262016@3	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO 12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	04262016@4	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	04262016@56	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	04272016@4	Human
QUAD4 (5ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	04272016@8	Human
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	04272016@9	Human
DETOMIDINE HCL/XYLAZINE (20ML) 10MG/10MG/ML INJECTABLE	04272016@94	Vet
TESTOSTERONE PROPIONATE 100MG/ML INJECTABLE	04282016@1	Human
NANDROLONE DECANOATE (H) 200MG/ML INJECTABLE	04282016@3	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	04282016@41	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	04282016@43	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO 12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	04282016@5	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	04282016@7	Human
TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	04292016@10	Human
B-COMPLEX + VIT C 20MG/ML INJECTABLE	04292016@11	Human
TRIMIX - (5ML) 30MG / 1MG / 10MCG INJECTABLE	04292016@16	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML		

INJECTABLE	04292016@3	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 20MG/ML INJECTABLE	04292016@5	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	04292016@80	Human
METHYLCOBALAMIN (DR HALL KIT) 1,000MCG/ML INJECTABLE	04292016@93	Human
BUPRENORPHINE HCL 0.6MG/ML INJECTABLE	05022016@1	Human
MEDROXYPROGESTERONE ACETATE 200MG/ML INJECTABLE	05022016@11	Vet
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	05022016@14	Human
MITOMYCIN SOLUTION, STERILE 0.04% (400MCG/ML) OPHTHALMIC	05022016@160	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	05022016@189	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	05022016@4	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 20MG/ML INJECTABLE	05022016@6	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	05022016@9	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	05032016@1	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	05032016@11	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	05032016@15	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	05032016@2	Human
TRIMIX (10ML VIAL) 17.65MG/0.59MG/5.9MCG INJECTABLE	05042016@16	Human
CHORIONIC GONADOTROPIN + B12 10,000 UNIT KIT	05042016@162	Human
TRI1 - NR (5ML) 3.6MG/0.4MG/0.04MG INJECTABLE	05042016@18	Human
TRI2 - NR (2ML) 30MG/3MG/0.3MG INJECTABLE	05042016@19	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05042016@20	Human
TRI-TEST 200 (CEP) 200MG/ML INJECTABLE	05042016@3	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	05042016@6	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	05052016@134	Human
ULTRA-TEST 200 - (10ML VIAL) 200MG/ML INJECTABLE	05052016@2	Human
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05052016@33	Human
TESTOSTERONE CYPIONATE/ZINC SULFATE IN GRAPESEED 200MG/200MCG/ML INJECTABLE	05052016@4	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	05052016@5	Human
VITAMIN D3 IN SESAME OIL 50,000 IU/ML INJECTABLE	05052016@6	Human

TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	05062016@3	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	05062016@4	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	05062016@5	Human
TRIMIX - (5ML) 30MG / 2MG / 40MCG INJECTABLE	05062016@9	Human
ESTRADIOL CYPIONATE 5MG/ML INJECTABLE	05092016@12	Vet
ALPROSTADIL 40MCG/ML INJECTABLE	05092016@14	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	05092016@4	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	05092016@57	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	05092016@6	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	05102016@1	Human
TESTOSTERONE CYPIONATE/ANASTROZOLE 200MG/1MG/ML INJECTABLE	05102016@10	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 100MG/ML INJECTABLE	05102016@123	Human
TRI1 - NR (2ML) 3.6MG/0.4MG/0.04MG INJECTABLE	05102016@18	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	05102016@54	Human
GLUCOSAMINE SULFATE 20% INJECTABLE	05102016@6	Vet
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	05112016@23	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	05112016@24	Human
PROGESTERONE IN SESAME OIL 150MG/ML INJECTABLE	05112016@3	Vet
PENTOSAN SODIUM POLYSULFATE 250MG/ML INJECTABLE	05112016@8	Vet
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05122016@11	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05122016@12	Human
TRIMIX - (5ML) 30MG / 2MG / 40MCG INJECTABLE	05122016@163	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	05122016@180	Human
ARGININE HCL 100MG/ML INJECTABLE	05122016@3	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO * (10ML)*12.5/25/25/25/12.5/0.2/20MG/ML INJECTABLE	05122016@6	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	05122016@7	Human
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05132016@19	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05132016@21	Human

VITAMIN D3 IN SESAME OIL (5ML) 100,000 IU/ML INJECTABLE	05132016@3	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO * (10ML)*12.5/25/25/25/12.5/0.2/20MG/ML INJECTABLE	05132016@7	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	05132016@9	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 3,500 UNIT VIAL VIAL	05162016@136	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	05162016@14	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	05162016@16	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	05162016@2	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE 15MG/5.4MG/75MG KIT	05162016@37	Human
ULTRA-TEST 250 (CYP 80%/PROP 20%) 250MG/ML INJECTABLE	05162016@5	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	05162016@6	Human
METHYLCOBALAMIN - 10ML 1,000MCG/ML INJECTABLE	05172016@1	Human
SERMORELIN ACETATE/GHRP (6) 6MG/3MG KIT	05172016@229	Human
LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	05172016@4	Human
BIMIX - (10ML) 30MG/1MG INJECTABLE	05172016@44	Human
ALPROSTADIL 40MCG/ML INJECTABLE	05172016@48	Human
ULTRA-TEST 200 (8ML) GRAPESEED OIL (CYP 90%/PROP 10%) 200MG/ML INJECTABLE	05172016@5	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	05172016@6	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	05182016@1	Human
QUAD2 (5ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	05182016@15	Human
TRIMIX - (5ML) 30MG / 1MG / 10MCG INJECTABLE	05182016@16	Human
TRIMIX - (5ML) 30MG/2MG/20MCG INJECTABLE	05182016@17	Human
SERMORELIN ACETATE 15MG KIT	05182016@173	Human
SERMORELIN ACETATE/GHRP (2) 9MG/3MG KIT	05182016@176	Human
TRIMIX WITH ATROPINE (2ML VIAL) 30MG/3MG/300MCG/0.2MG/ML INJECTABLE	05182016@18	Human
MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	05182016@2	Human
SERMORELIN ACETATE/GHRP (2) 9MG/9MG KIT	05182016@215	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	05182016@3	Human
SERMORELIN ACETATE 28MG KIT	05182016@51	Human
METHYLCOBALAMIN 5,000MCG/ML INJECTABLE	05192016@1	Human

TRIMIX - (10ML) 30MG / 1MG / 10MCG INJECTABLE	05192016@22	Human
TRIMIX - (10ML) 30MG / 2MG / 20MCG INJECTABLE	05192016@23	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	05192016@3	Human
ULTRA-TEST 200 - (10ML VIAL) 200MG/ML INJECTABLE	05192016@7	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	05192016@84	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO 12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	05192016@9	Human
FLUORESCEIN/INDOCYANINE, LYOPHILIZED (P.F.) 400MG/15MG VIAL INJECTABLE	05202016@4	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL VIAL	05202016@55	Human
NANDROLONE DECANOATE (H) 200MG/ML INJECTABLE	05202016@6	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05202016@71	Human
ALPROSTADIL 20MCG/ML INJECTABLE	05202016@85	Human
SODIUM BICARBONATE, MDV 8.4% INJECTABLE	05232016@120	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	05232016@17	Human
TRI2 - NR (5ML) 30MG/3MG/0.3MG INJECTABLE	05232016@2	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 100MG/ML INJECTABLE	05232016@21	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	05232016@22	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 20,000 UNIT VIAL VIAL	05242016@1	Human
BIMIX - (10ML) 30MG/1MG INJECTABLE	05242016@11	Human
MITOMYCIN SOLUTION, STERILE 0.02% (200MCG/ML) OPHTHALMIC	05242016@128	Human
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	05242016@13	Human
MITOMYCIN SOLUTION, STERILE 0.02% (200MCG/ML) OPHTHALMIC	05242016@131	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	05242016@135	Human
METHIONINE/INOSITOL/CHOLINE+B12(M) + CARNITINE 12.5MG/50MG/100MG/1MG/50MG/ML INJECTABLE	05242016@15	Human
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	05242016@2	Human
CHORIONIC GONADOTROPIN + B12, LYOPHILIZED 10,000 UNIT VIAL VIAL	05252016@117	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	05252016@2	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	05252016@25	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE, LYOPHILIZED 15MG/5.4MG/75MG VIAL	05252016@33	Human

TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	05262016@1	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	05262016@12	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	05262016@13	Human
SERMORELIN ACETATE 28MG KIT	05262016@146	Human
TRIMIX - (5ML) 30MG / 2MG / 40MCG INJECTABLE	05262016@15	Human
TESTOSTERONE PROPIONATE 100MG/ML INJECTABLE	05262016@2	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	05262016@24	Human
TESTOSTERONE ENANTHATE-GRAPESEED OIL 200MG/ML INJECTABLE	05262016@3	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	05262016@32	Human
SERMORELIN ACETATE/GHRP (2) 3MG/4.5MG KIT	05272016@100	Human
FORSKOLIN/PAPAVARINE/PHENTOLAMINE/ALPROSTADIL 100MCG/30MG/3MG/60MCGINJECTABLE	05272016@18	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	05272016@2	Human
METHOCARBAMOL 100MG/ML INJECTABLE	05272016@3	Vet
CEFTAZIDIME, LYOPHILIZED 2.25% VIAL	05272016@47	Human
MEDROXYPROGESTERONE ACETATE 200MG/ML INJECTABLE	05272016@5	Vet
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/9MG/9MG KIT	05272016@55	Human
SERMORELIN ACETATE/GHRP (2) 6MG/4.5MG KIT	05272016@67	Human
SERMORELIN ACETATE/GHRP (6) 3MG/3MG KIT	05272016@73	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE, LYOPHILIZED 15MG/5.4MG/75MG VIAL	05312016@47	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	05312016@5	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 50MG/ML INJECTABLE	05312016@8	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	06012016@11	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	06012016@44	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06012016@6	Human
TRI-TEST 200 (CEP) 200MG/ML INJECTABLE	06012016@8	Human
B-COMPLEX + VIT C 20MG/ML INJECTABLE	06012016@9	Human
TESTOSTERONE CYPIONATE/ZINC SULFATE IN GRAPESEED 200MG/200MCG/ML INJECTABLE	06022016@13	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	06022016@5	Human

TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MGINJECTABLE	06022016@7	Human
SERMORELIN ACETATE/GHRP (6) 6MG/3MG KIT	06032016@136	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	06032016@2	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	06032016@3	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL VIAL	06032016@41	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 7,500 UNIT VIAL VIAL	06032016@44	Human
ARGININE/CITRULLINE/ORNITHINE+LIDOCAINE 100MG/100MG/100MG/10MG/ML INJECTABLE	06032016@7	Human
VITAMIN D3 IN SESAME OIL 50,000 IU/ML INJECTABLE	06062016@1	Human
CEFTAZIDIME, OPHTHALMIC KIT 2.25% KIT	06062016@118	Human
CHORIONIC GONADOTROPIN + B12 10,000 UNIT KIT	06062016@122	Human
VITAMIN D3 IN SESAME OIL (5ML) 100,000 IU/ML INJECTABLE	06062016@7	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	06072016@17	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	06072016@18	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	06072016@3	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	06072016@32	Human
FLUORESCEIN/INDOCYANINE, (P.F.) 400MG/15MG VIAL KIT	06082016@133	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06082016@2	Human
ULTRA-TEST 200 (8ML) GRAPESEED OIL (CYP 90%/PROP 10%) 200MG/ML INJECTABLE	06082016@44	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 20MG INJECTABLE	06082016@7	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	06082016@75	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	06082016@8	Human
TRIMIX - (10ML) 30MG / 2MG / 20MCG INJECTABLE	06082016@82	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	06092016@17	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	06092016@30	Human
TESTOSTERONE CYPIONATE/ANASTROZOLE 200MG/1MG/ML INJECTABLE	06092016@4	Human
QUAD4 (5ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	06102016@13	Human

MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	06102016@2	Human
TESTOSTERONE CYPIONATE/ZINC SULFATE IN GRAPESEED 200MG/200MCG/ML INJECTABLE	06102016@35	Human
ULTRA-TEST 200 (8ML) GRAPESEED OIL (CYP 90%/PROP 10%) 200MG/ML INJECTABLE	06102016@6	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/9MG/9MG KIT	06102016@62	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	06102016@9	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	06132016@1	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	06132016@155	Human
PHENTOLAMINE/ALPROSTADIL 3MG/60MCG INJECTABLE	06132016@18	Human
METHYLCOBALAMIN 5,000MCG/ML INJECTABLE	06132016@23	Human
TRIMIX - (10ML) 30MG / 1MG / 10MCG INJECTABLE	06132016@36	Human
NANDROLONE DECANOATE (H) 200MG/ML INJECTABLE	06132016@4	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	06132016@93	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	06142016@1	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06142016@148	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	06142016@19	Human
TRI2 - NR (2ML) 30MG/3MG/0.3MG INJECTABLE	06142016@28	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	06142016@39	Human
QUAD2 (2ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	06142016@42	Human
TRI1 - NR (5ML) 3.6MG/0.4MG/0.04MG INJECTABLE	06142016@43	Human
PENTOSAN SODIUM POLYSULFATE 250MG/ML INJECTABLE	06142016@47	Vet
SODIUM BICARBONATE, MDV 8.4% INJECTABLE	06142016@9	Human
PROGESTERONE IN SESAME OIL 150MG/ML INJECTABLE	06152016@1	Vet
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	06152016@15	Human
TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	06152016@22	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	06152016@57	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	06152016@7	Human
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	06162016@129	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	06162016@13	Human
METHYLCOBALAMIN - 10ML 1,000MCG/ML INJECTABLE	06162016@2	Human

LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	06162016@6	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06162016@9	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	06172016@120	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06172016@13	Human
SERMORELIN ACETATE/GHRP (2) 9MG/3MG KIT	06172016@142	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE 15MG/5.4MG/75MG KIT	06172016@161	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	06172016@3	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 7,500 UNIT VIAL VIAL	06202016@137	Human
TRIMIX 17.65MG/0.59MG/5.9MCG INJECTABLE	06202016@157	Human
TRIMIX (5ML) 30MG / 3MG / 60MCG INJECTABLE	06202016@162	Human
MEDROXYPROGESTERONE ACETATE 200MG/ML INJECTABLE	06202016@2	Vet
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	06212016@17	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	06212016@2	Human
TRI2 - NR (5ML) 30MG/3MG/0.3MG INJECTABLE	06212016@21	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	06212016@42	Human
TRI-TEST 200 (CEP) 200MG/ML INJECTABLE	06212016@5	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE, LYOPHILIZED 15MG/5.4MG/75MG VIAL	06212016@80	Human
SERMORELIN ACETATE 9MG KIT	06222016@106	Human
SERMORELIN ACETATE/GHRP (6) 6MG/3MG KIT	06222016@121	Human
SERMORELIN ACETATE/GHRP (6) 6MG/3MG KIT	06222016@148	Human
METHIONINE/INOSITOL/CHOLINE+B12(M) + CARNITINE 12.5MG/50MG/100MG/1MG/50MG/ML INJECTABLE	06222016@28	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	06222016@30	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	06222016@42	Human
METHOCARBAMOL 100MG/ML INJECTABLE	06222016@7	Vet
TRI1 - NR (2ML) 3.6MG/0.4MG/0.04MG INJECTABLE	06232016@12	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	06232016@13	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	06232016@147	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	06232016@23	Human
MEDROXYPROGESTERONE ACETATE 200MG/ML INJECTABLE	06232016@27	Vet

CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL VIAL	06232016@49	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	06232016@70	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	06232016@74	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06232016@78	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	06242016@11	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE 15MG/5.4MG/75MG KIT	06242016@135	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 3,500 UNIT VIAL VIAL	06242016@96	Human
TESTOSTERONE ENANTHATE-GRAPESEED OIL 200MG/ML INJECTABLE	06242016@97	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	06272016@13	Human
VITAMIN D3 IN SESAME OIL (5ML) 100,000 IU/ML INJECTABLE	06272016@17	Human
QUAD4 (2ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	06272016@22	Human
ESTRONE AQUEOUS 5MG/ML INJECTABLE	06272016@29	Vet
TESTOSTERONE PROPIONATE 100MG/ML INJECTABLE	06272016@8	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	06282016@31	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	06282016@36	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	06282016@45	Human
MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	06282016@71	Human
ESTRADIOL CYPIONATE 5MG/ML INJECTABLE	06282016@79	Vet
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	06282016@80	Human
METHIONINE/INOSITOL/CHOLINE/B12(M)CARN/CHROM/LYSINE/DMG 25/50/50/0.5/50/25MCG/25/25 INJECTABLE	06292016@10	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	06292016@2	Human
TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MGINJECTABLE	06292016@25	Human
ESTRONE AQUEOUS 5MG/ML INJECTABLE	06292016@5	Vet
GLUTAMINE/ORNITHINE/ARGININE/LYSINE+LIDOCAINE 75MG/75MG/150MG/150MG/10MG/ML INJECTABLE	06292016@9	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	06302016@1	Human
ALPROSTADIL 20MCG/ML INJECTABLE	06302016@4	Human
CARNITINE/TAURINE/B12(M) (10ML VIAL) 15MG/15MG/1MG	06302016@90	Human

INJECTABLE		
NICOTINAMIDE ADENINE DINUCLEOTIDE (NADH) - LYOPHILIZED (P.F.) 100MG INJECTABLE	06302016@95	Human
GLUTAMINE/ARGININE/CARNITINE 25MG/100MG/200MG/ML INJECTABLE	07012016@10	Human
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	07012016@112	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	07012016@18	Human
TRI2 - NR (5ML) 30MG/3MG/0.3MG INJECTABLE	07012016@22	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	07012016@32	Human
NANDROLONE DECANOATE (H) 200MG/ML INJECTABLE	07052016@1	Human
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	07052016@12	Human
SERMORELIN ACETATE 15MG KIT	07052016@148	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO * (10ML)*12.5/25/25/25/12.5/0.2/20MG/ML INJECTABLE	07052016@19	Human
TESTOSTERONE CYPIONATE/ZINC SULFATE IN GRAPESEED 200MG/200MCG/ML INJECTABLE	07052016@6	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	07052016@76	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	07062016@10	Human
TESTOSTERONE CYPIONATE/ANASTROZOLE 200MG/1MG/ML INJECTABLE	07062016@12	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	07062016@156	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+LIDO 20MG/40MG/50MG/10MG/ML INJECTABLE	07062016@19	Human
QUAD4 (5ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	07062016@29	Human
QUAD2 (5ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	07062016@46	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 20MG/ML INJECTABLE	07062016@7	Human
ARGININE HCL 100MG/ML INJECTABLE	07072016@15	Human
PROGESTERONE IN SESAME OIL 150MG/ML INJECTABLE	07072016@7	Vet
MITOMYCIN, LYOPHILIZED (BUFFERED) 40MG INJECTABLE	07072016@94	Human
DEXAMETHASONE SOD. PHOSPHATE 200MG/ML INJECTABLE	07082016@25	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	07082016@79	Human
TRIMIX - (5ML) 30MG / 2MG / 40MCG INJECTABLE	07082016@9	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	07112016@11	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	07112016@5	Human

BUPRENORPHINE HCL 0.6MG/ML INJECTABLE	07122016@144	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	07122016@20	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	07122016@21	Human
TRI1 - NR (5ML) 3.6MG/0.4MG/0.04MG INJECTABLE	07122016@40	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	07122016@41	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	07122016@42	Human
METHYLCOBALAMIN 5,000MCG/ML INJECTABLE	07132016@10	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 100MG/ML INJECTABLE	07132016@18	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	07132016@25	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+LIDO 20MG/40MG/50MG/10MG/ML INJECTABLE	07132016@5	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	07132016@68	Human
ULTRA-TEST 200 - (10ML VIAL) 200MG/ML INJECTABLE	07142016@28	Human
CYCLOSPORINE (A) OIL SOLUTION - (10ML) 2% OPHTHALMIC	07142016@35	Vet
MITOMYCIN SOLUTION, STERILE 0.02% (200MCG/ML) OPHTHALMIC	07142016@64	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	07152016@8	Human
TRIMIX (2ML VIAL) 30MG/1MG/25MCG INJECTABLE	07192016@24	Human
TRIMIX (2ML VIAL) 17.65MG/0.59MG/5.9MCG INJECTABLE	07192016@25	Human
TRIMIX (5ML VIAL) 30MG/1MG/25MCG INJECTABLE	07192016@26	Human
TRIMIX (2ML) 30MG / 3MG / 60MCG INJECTABLE	07192016@27	Human
ALPROSTADIL 40MCG/ML INJECTABLE	07192016@28	Human
TRIMIX WITH ATROPINE (5ML) 30MG/3MG/150MCG/0.2MG/ML INJECTABLE	07192016@3	Human
TRIMIX (2ML VIAL) 30MG/3MG/100MCG INJECTABLE	07192016@5	Human
TRIMIX (5ML VIAL) 30MG/3MG/100MCG INJECTABLE	07192016@7	Human
TRIMIX WITH ATROPINE (10ML) 30MG/3MG/300MCG/0.2MG/ML INJECTABLE	07192016@8	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	07202016@44	Vet
METHYLCOBALAMIN - 10ML 1,000MCG/ML INJECTABLE	07202016@47	Human
ARGININE/CARNITINE/CITRULLINE/LIDOCAINE HCL 100MG/100MG/100MG/10MG/ML INJECTABLE	07202016@50	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	07202016@55	Human
B-COMPLEX + VIT C 20MG/ML INJECTABLE	07212016@11	Human
METHIONINE/INOSITOL/CHOLINE/B12(M)/CARN/CHROM/LYSINE/DMG	07212016@15	Human

25/50/50/0.5/50/25MCG/25/25 INJECTABLE		
GLUTAMINE/ORNITHINE/ARGININE/LYSINE/CITRULLINE+LIDOCAINE 75MG/75MG/150MG/50MG/100MG/10MG/ML INJECTABLE	07212016@2	Human
LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	07212016@8	Human
TRIMIX - (2ML) 30MG / 1MG / 10MCG INJECTABLE	07222016@15	Human
TRIMIX - (5ML) 30MG/2MG/20MCG INJECTABLE	07222016@16	Human
CARNITINE-L 250MG/ML INJECTABLE	07222016@2	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	07222016@26	Human
ULTRA-TEST 250 (CYP 80%/PROP 20%) 250MG/ML INJECTABLE	07252016@16	Human
TRI-TEST 200 (CEP) 200MG/ML INJECTABLE	07252016@22	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE+LIDOCAINE 75MG/75MG/150MG/150MG/10MG/MLINJECTABLE	07252016@39	Human
GLUTATHIONE - 30ML 200MG/ML INJECTABLE	07252016@46	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	07252016@52	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 7,500 UNIT VIAL VIAL	07252016@56	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	07262016@29	Human
TRI2 - NR (2ML) 30MG/3MG/0.3MG INJECTABLE	07262016@34	Human
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	07262016@36	Human
TRI1 - NR (5ML) 3.6MG/0.4MG/0.04MG INJECTABLE	07262016@47	Human
TRIMIX (10ML) 30MG / 3MG / 60MCG INJECTABLE	07262016@49	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	07272016@16	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	07272016@68	Human
NANDROLONE DECANOATE (H) 200MG/ML INJECTABLE	07272016@7	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	07272016@8	Human
SERMORELIN ACETATE/GHRP (2) 9MG/3MG KIT	07272016@83	Human
TESTOSTERONE ENANTHATE-GRAPESEED OIL 200MG/ML INJECTABLE	07282016@1	Human
TITAN UP (INOS/CHOL/LEUC/CARN/CHROM/LIDO) 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	07282016@12	Human
METHYLCOBALAMIN (DR HALL KIT) 1,000MCG/ML INJECTABLE	07282016@26	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	07282016@5	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 3,500 UNIT VIAL VIAL	07282016@51	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML	07292016@12	Human

INJECTABLE		
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	07292016@2	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	07292016@8	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	08012016@25	Human
ALPROSTADIL 20MCG/ML INJECTABLE	08012016@32	Human
VITAMIN D3 IN SESAME OIL 50,000 IU/ML INJECTABLE	08012016@34	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE/CITRULLINE+LIDOCAINE 75MG/75MG/150MG/50MG/100MG/10MG/ML INJECTABLE	08012016@35	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL VIAL	08012016@41	Human
ESTRADIOL CYPIONATE 5MG/ML INJECTABLE	08022016@13	Vet
CYCLOSPORINE (A) OIL SOLUTION - (10ML) 2% OPHTHALMIC	08022016@20	Vet
PROGESTERONE IN SESAME OIL 150MG/ML INJECTABLE	08022016@27	Vet
DETOMIDINE HCL/XYLAZINE (20ML) 10MG/10MG/ML INJECTABLE	08022016@70	Vet
ESTRONE AQUEOUS 5MG/ML INJECTABLE	08022016@8	Vet
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	08032016@12	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	08032016@17	Human
TRIMIX - (10ML) 30MG / 2MG / 20MCG INJECTABLE	08032016@34	Human
TRIMIX - (10ML) 30MG / 1MG / 10MCG INJECTABLE	08032016@35	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	08032016@38	Human
GLUTAMINE/ARGININE/CARNITINE 25MG/100MG/200MG/ML INJECTABLE	08032016@42	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	08042016@13	Human
ULTRA-TEST 200 (8ML) GRAPESEED OIL (CYP 90%/PROP 10%) 200MG/ML INJECTABLE	08042016@14	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	08042016@21	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	08042016@35	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE, LYOPHILIZED 15MG/5.4MG/75MG VIAL	08042016@39	Human
QUAD4 (5ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	08052016@1	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	08052016@11	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	08052016@12	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	08052016@13	Human
FLUNIXIN MEGLUMINE 50MG/ML INJECTABLE	08052016@47	Vet

DEXAMETHASONE SODIUM PHOSPHATE 24MG/ML (2.4%) INJECTABLE	08052016@65	Human
SERMORELIN ACETATE 28MG KIT	08052016@74	Human
DEXAMETHASONE SODIUM PHOSPHATE 24MG/ML (2.4%) INJECTABLE	08082016@45	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 20,000 UNIT VIAL VIAL	08082016@50	Human
NICOTINAMIDE ADENINE DINUCLEOTIDE (NADH) - LYOPHILIZED (P.F.) 100MG INJECTABLE	08082016@58	Human
CARNITINE/TAURINE/B12(M) (10ML VIAL) 15MG/15MG/1MG INJECTABLE	08082016@67	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	08082016@80	Human
QUAD2 (5ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	08092016@18	Human
METHIONINE/INOSITOL/CHOLINE/B12(M)CARN/CHROM/LYSINE/DMG 25/50/50/0.5/50/25MCG/25/25 INJECTABLE	08092016@19	Human
FLUNIXIN MEGLUMINE 50MG/ML INJECTABLE	08092016@57	Vet
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	08092016@6	Human
METHIONINE/INOSITOL/CHOLINE+B12(M) + CARNITINE 12.5MG/50MG/100MG/1MG/50MG/MLINJECTABLE	08102016@2	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	08102016@22	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE+LIDOCAINE 75MG/75MG/150MG/150MG/10MG/ML INJECTABLE	08102016@24	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO * (10ML)*12.5/25/25/25/12.5/0.2/20MG/ML INJECTABLE	08102016@9	Human
SERMORELIN ACETATE/GHRP (2)/THEANINE 15MG/5.4MG/75MG KIT	08112016@121	Human
GLUTATHIONE - 30ML 200MG/ML INJECTABLE	08112016@19	Human
METHYLCOBALAMIN 5,000MCG/ML INJECTABLE	08112016@22	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	08112016@4	Human
FLUNIXIN MEGLUMINE 50MG/ML INJECTABLE	08112016@7	Vet
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	08122016@1	Human
NADH/CARNITINE/TAURINE/B12(M) - KIT 100MG NADH / 150MG/150MG/10MG KIT	08122016@103	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	08122016@3	Human
QUAD2 (2ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	08152016@17	Human
TESTOSTERONE CYPIONATE/ANASTROZOLE 200MG/1MG/ML INJECTABLE	08152016@3	Human
CHORIONIC GONADOTROPIN + B12, LYOPHILIZED 10,000 UNIT VIAL	08152016@40	Human

VIAL		
TESTOSTERONE PROPIONATE 100MG/ML INJECTABLE	08162016@1	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/MLINJECTABLE	08162016@10	Human
CARNITINE-L 250MG/ML INJECTABLE	08172016@1	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	08172016@13	Human
INDOCYANINE GREEN, LYOPHILIZED (P.F.) 15MG VIAL	08172016@45	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	08172016@5	Human
FLUORESCEIN/INDOCYANINE, LYOPHILIZED (P.F.) 400MG/15MG VIAL INJECTABLE	08172016@55	Human
GLUTAMINE/ARGININE/CARNITINE 25MG/100MG/200MG/ML INJECTABLE	08182016@11	Human
TRI1 - NR (2ML) 3.6MG/0.4MG/0.04MG INJECTABLE	08182016@26	Human
TRIMIX - (5ML) 30MG/2MG/20MCG INJECTABLE	08182016@27	Human
ESTRONE AQUEOUS 5MG/ML INJECTABLE	08182016@7	Vet
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	08192016@10	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE/CITRULLINE+LIDOCAINE 75MG/75MG/150MG/50MG/100MG/10MG/ML INJECTABLE	08192016@11	Human
CHORIONIC GONADOTROPIN + B12 10,000 UNIT KIT	08192016@110	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	08192016@39	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	08192016@45	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL VIAL	08192016@47	Human
BIMIX - (5ML) 30MG/1MG INJECTABLE	08222016@15	Human
MEDROXYPROGESTERONE ACETATE 200MG/ML INJECTABLE	08222016@18	Vet
METHYLCOBALAMIN - 10ML 1,000MCG/ML INJECTABLE	08222016@6	Human
TESTOSTERONE CYPIONATE/ZINC SULFATE IN GRAPESEED 200MG/200MCG/ML INJECTABLE	08232016@2	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	08232016@24	Human
SERMORELIN ACETATE/GHRP (2) 9MG/3MG KIT	08232016@32	Human
INDOCYANINE GREEN - KIT 15MG INJECTABLE	08232016@42	Human
METHIONINE/INOSITOL/CHOLINE/B12(M)CARN/CHROM/LYSINE/DMG 25/50/50/0.5/50/25MCG/25/25 INJECTABLE	08232016@5	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 5,000 UNIT VIAL VIAL	08242016@33	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 6,000 UNIT VIAL		

VIAL	08242016@41	Human
ARGININE HCL 100MG/ML INJECTABLE	08252016@10	Human
ARGININE HCL 100MG/ML INJECTABLE	08252016@17	Human
CARNITINE-L 250MG/ML INJECTABLE	08252016@20	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE+LIDOCAINE 75MG/75MG/150MG/150MG/10MG/ML INJECTABLE	08252016@27	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 11,000 UNIT VIAL VIAL	08252016@3	Human
METHIONINE/INOSITOL/CHOLINE/CHROMIUM+B12(M) - 10ML 25MG/50MG/50MG/25MCG/1MG/ML INJECTABLE	08252016@34	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 200MG/ML INJECTABLE	08262016@2	Human
TRI-TEST 200 (CEP) 200MG/ML INJECTABLE	08262016@3	Human
LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	08262016@6	Human
METHIONINE/INOSITOL/CHOLINE/B-COMPLEX - (30ML) 15MG/50MG/100MG/ML INJECTABLE	08262016@8	Human
TRIMIX - (10ML) 30MG / 1MG / 10MCG INJECTABLE	08292016@23	Human
QUAD2 (5ML) 9MG/1MG/10MCG/0.1MG/ML INJECTABLE	08292016@25	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	08292016@26	Human
ARGININE HCL 100MG/ML INJECTABLE	08292016@3	Human
QUAD4 (5ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	08292016@5	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	08292016@6	Human
ARGININE HCL 100MG/ML INJECTABLE	08302016@65	Human
SERMORELIN ACETATE 28MG KIT	09062016@105	Human
SERMORELIN ACETATE 15MG KIT	09062016@114	Human
GLUTATHIONE - 30ML 200MG/ML INJECTABLE	09062016@24	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE+LIDOCAINE 75MG/75MG/150MG/150MG/10MG/ML INJECTABLE	09062016@27	Human
CARNITINE-L 250MG/ML INJECTABLE	09062016@30	Human
METHYLCOBALAMIN 5,000MCG/ML INJECTABLE	09062016@32	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	09062016@33	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/3.15MG/3.15MG KIT	09062016@74	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/9MG/9MG KIT	09062016@75	Human
SERMORELIN ACETATE/GHRP (2) 9MG/9MG KIT	09062016@92	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 100MG/ML INJECTABLE	09072016@10	Human
BIMIX - (10ML) 30MG/1MG INJECTABLE	09072016@18	Human
QUAD1 (2ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	09072016@19	Human
QUAD1 (5ML) 0.9MG/0.2MG/20MCG/0.01MG/ML INJECTABLE	09072016@20	Human

QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	09072016@21	Human
TRI2 - NR (2ML) 30MG/3MG/0.3MG INJECTABLE	09072016@22	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	09072016@7	Human
TRIMIX - (5ML) 30MG / 2MG / 40MCG INJECTABLE	09082016@25	Human
TRI1 - NR (2ML) 3.6MG/0.4MG/0.04MG INJECTABLE	09082016@27	Human
TRIMIX - (5ML) 30MG / 1MG / 10MCG INJECTABLE	09082016@28	Human
QUAD4 (2ML) 30MG/3MG/60MCG/0.2MG/ML INJECTABLE	09082016@29	Human
TRI2 - NR (5ML) 30MG/3MG/0.3MG INJECTABLE	09082016@31	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 20MG/ML INJECTABLE	09082016@33	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (3ML) 200MG/ML INJECTABLE	09082016@35	Human
METHYLCOBALAMIN (DR HALL KIT) 1,000MCG/ML INJECTABLE	09082016@37	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 50MG/ML INJECTABLE	09082016@38	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (1ML) 100MG/ML INJECTABLE	09082016@40	Human
MIC COMBO - STANDARD (30ML) 15MG/50MG/100MG/ML INJECTABLE	09092016@1	Human
B-COMPLEX + VIT C 20MG/ML INJECTABLE	09092016@11	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	09092016@15	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 7,500 UNIT VIAL VIAL	09092016@17	Human
CHORIONIC GONADOTROPIN, LYOPHILIZED (HCG) 3,500 UNIT VIAL VIAL	09092016@20	Human
QUAD3 (5ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	09092016@35	Human
SERMORELIN ACETATE/GHRP (2) & (6) 9MG/9MG/9MG KIT	09092016@49	Human
ARGININE/CITRULLINE/ORNITHINE+LIDOCAINE 100MG/100MG/100MG/10MG/ML INJECTABLE	09092016@5	Human
SERMORELIN ACETATE/GHRP (2) 9MG/3MG KIT	09122016@138	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (5ML) 200MG/ML INJECTABLE	09122016@17	Human
ULTRA-TEST 200 - (10ML VIAL) 200MG/ML INJECTABLE	09122016@23	Human
LEUCINE/ISOLEUCINE/VALINE 10MG/10MG/5MG/ML INJECTABLE	09122016@26	Human
MIC/B12 (M)- (30ML) 15MG/50MG/100MG/1MG/ML INJECTABLE	09122016@28	Human
GLUTAMINE/ORNITHINE/ARGININE/LYSINE/CITRULLINE+LIDOCAINE 75MG/75MG/150MG/50MG/100MG/10MG/ML INJECTABLE	09122016@32	Human
INOSITOL/CHOLINE/B-COMP+LEUCINE+CARN+CHROM+LIDO 25MG/25MG/1.5MG/25MG/25MCG/10MG INJECTABLE	09122016@37	Human

SERMORELIN ACETATE/GHRP (2)/THEANINE, LYOPHILIZED 15MG/5.4MG/75MG VIAL	09122016@54	Human
SODIUM BICARBONATE, MDV 8.4% INJECTABLE	09122016@9	Human
SERMORELIN ACETATE/GHRP (6) 6MG/3MG KIT	09132016@102	Human
TESTOSTERONE CYPIONATE IN SESAME OIL 200MG/ML INJECTABLE	09132016@12	Human
TESTOSTERONE CYPIONATE IN SESAME OIL (1ML) 200MG/ML INJECTABLE	09132016@14	Human
METHYLCOBALAMIN - 30ML 1,000MCG/ML INJECTABLE	09132016@15	Human
DMSO W/LIDOCAINE 50%/0.5% SOLUTION	09132016@17	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CAR+ARG+CHR+LIDO 12.5/25/25/25MG/12.5MG/0.2MG/20MG INJECTABLE	09132016@20	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP/(M)/CHROMIUM/CARNITINE 20MG/40MG/50MG/25MCG/25MG/ML INJECTABLE	09132016@24	Human
METHIONINE/INOSITOL/CHOLINE/B-COMP+CARN+LIDO (30ML)15MG/30MG/30MG/85MG/20MG/ML INJECTABLE	09132016@6	Human
SERMORELIN ACETATE/GHRP (2) 6MG/4.5MG KIT	09132016@98	Human
QUAD3 (2ML) 30MG/3MG/30MCG/0.1MG/ML INJECTABLE	09142016@17	Human
TESTOSTERONE CYPIONATE IN GRAPE SEED OIL (10ML) 200MG/ML INJECTABLE	09142016@27	Human
TESTOSTERONE PROPIONATE 100MG/ML INJECTABLE	09142016@28	Human
PHENYLEPHRINE HCL - (5ML) 1MG/ML (0.1%) INJECTABLE	09142016@38	Human
ALPROSTADIL 40MCG/ML INJECTABLE	09142016@40	Human
TRIMIX - (5ML) 30MG/2MG/20MCG INJECTABLE	09142016@41	Human

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EXHIBIT B

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
555 Winderley Place, Suite 200 Maitland, FL 32751 (407)475-4700 Fax:(407)475-4768	6/18/2018-6/22/2018
	FEI NUMBER 3006228598

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Kristopher J. Fishman, Senior Vice President of Operations

FIRM NAME	STREET ADDRESS
Wells Pharmacy Network LLC	1210 SW 33rd Ave
CITY, STATE, ZIP CODE, COUNTRY Ocala, FL 34474-2853	TYPE ESTABLISHMENT INSPECTED Preparer of Sterile and Non-Sterile Drug Products

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

DURING AN INSPECTION OF YOUR FIRM I OBSERVED:

OBSERVATION 1

You used a non-pharmaceutical grade component in the formulation of a drug product.

Specifically, you use (b) (4) (b) (4) produced by (b) (4) to prepare the sub-formula ID (b) (4) (b) (4) ((b) (4)) liquid that is used to prepare non-sterile drug suspensions for oral use (prednisolone 10 mg / ml lot 03302018@103), topical non-sterile drug gels (hyaluronic acid sodium salt 2 % lot 03132018@52) and nasal sprays (oxytocin nasal spray lot 06072018@35). You could provide no documentation that this (b) (4) is USP grade as listed in the formula worksheet or (b) (4) for pharmaceutical use.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Joanne E King, Investigator	X Joanne E King Investigator Signed By 1300174867 Date Signed 06-22-2018 15 46 22	6/22/2018

EXHIBIT C

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA Florida District 555 Winderley Place, Suite 200 Maitland FL 32751 (407) 475-4700 Industry Information: www.fda.gov/oc/industry	8/29-9/2/16 & 9/13/16
	FEI NUMBER FEI: 3006228598

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Benjamin H. David, President & CEO

FIRM NAME	STREET ADDRESS
Wells Pharmacy Network, LLC	1210 SW 33rd Ave.
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Ocala, FL 34474	Producer of Sterile Drug Products

THIS DOCUMENT LISTS OBSERVATIONS MADE BY THE FDA REPRESENTATIVE(S) DURING THE INSPECTION OF YOUR FACILITY. THEY ARE INSPECTIONAL OBSERVATIONS; AND DO NOT REPRESENT A FINAL AGENCY DETERMINATION REGARDING YOUR COMPLIANCE. IF YOU HAVE AN OBJECTION REGARDING AN OBSERVATION, OR HAVE IMPLEMENTED, OR PLAN TO IMPLEMENT CORRECTIVE ACTION IN RESPONSE TO AN OBSERVATION, YOU MAY DISCUSS THE OBJECTION OR ACTION WITH THE FDA REPRESENTATIVE(S) DURING THE INSPECTION OR SUBMIT THIS INFORMATION TO FDA AT THE ADDRESS ABOVE. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT FDA AT THE PHONE NUMBER AND ADDRESS ABOVE.

DURING AN INSPECTION OF YOUR FIRM (I) (WE) OBSERVED:

OBSERVATION 1

Actionable microbial contamination was present in the ISO 5 area or in adjacent areas during aseptic production.

Specifically, from 2/22/16 to 7/7/16 your firm detected high levels of fungal growth during routine Environmental Monitoring (EM) of active viable air within the IV Clean Room which consists of the (b) (4) . This is evident by the following examples:

February: 7 cfus of Penicillium spp. within the (b) (4)
March: 10 cfus of Cladosporium spp. within the (b) (4)
May: 1 cfu of unidentified basidiomycete within the (b) (4), 1 cfu of penicillium spp. within the (b) (4), and 1 cfu of unidentified coelomycete within the (b) (4),
June: 3 cfus of Cladosporium spp. within the (b) (4), 1 cfu of bacillus spp. (b) (4) and 1 cfu of Cladosporium spp. within the (b) (4)
July: 2 cfus of penicillium spp., 1 cfu of Cladosporium spp. and 1 cfu of aspergillus sydowii, 3 cfus of non-sporulating hyaline fungus, 2 cfus of Cladosporium spp., 1 cfu of penicillium spp., 1 cfu of penicillium spp. and 1 cfu of Cladosporium spp. within the (b) (4).

During this time, your firm continued to produce sterile drug products within the IV Clean Room without adequately evaluating the impact of fungal growth detected during the active air sampling. Your firm initiated an investigation (signed on 7/29/16) for EM conducted in the IV Clean Room. Your firm's investigation determined the root cause of the fungal growth to be a ceiling tile showing fungal growth in close proximity to a fire sprinkler. However, you did not cease sterile drug production in the IV Clean Room until 07/15/16.

Concurrent to this finding, the following three (3) batches failed sterility testing: HCG 5,000 iu lyophilized injectable lot # 06202016@137, Titan Ultra lyophilized injectable lot # 06302016@95 and Quad 2 Injectable lot # 07062016@46. Your firm's corrective action was to discard all sterile drug products produced from 6/20-7/12/16,

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
	Jessica L. Pressley	Jessica L. Pressley, Drug Investigator Meredith M. Cobb, Consumer Safety Officer	09/13/2016

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA Florida District 555 Winderley Place, Suite 200 Maitland FL 32751 (407) 475-4700 Industry Information: www.fda.gov/oc/industry	8/29-9/2/16 & 9/13/16
	FEI NUMBER FEI: 3006228598

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Benjamin H. David, President & CEO

FIRM NAME	STREET ADDRESS
Wells Pharmacy Network, LLC	1210 SW 33rd Ave.
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Ocala, FL 34474	Producer of Sterile Drug Products

but your quality unit failed to evaluate all sterile drug products currently on the market within expiration (i.e. HCG with a 6 month expiration) that were produced since February 2016 in the IV Clean Room.

OBSERVATION 2
Your firm did not conduct smoke studies of the aseptic processing area under dynamic conditions.

Specifically, the aseptic processing environment in your (b) (4) Clean Room is under negative pressure and the smoke studies performed on the (b) (4) located in this area did not demonstrate that the non-hazardous sterile drug products produced are protected from microbial contamination. Your firm has been producing non-hazardous sterile drug products in the (b) (4) Clean Room since 7/19/16.

OBSERVATION 3
Your firm continued producing sterile drug products while construction was ongoing within your facility without establishing adequate controls to prevent contamination of the production environment.

Specifically, during the construction of the (b) (4) Clean Room which began on (b) (4), your firm produced sterile drugs in the IV Clean Room and the (b) (4) Clean Room and did not have adequate controls in place to protect the production environment within these areas. Moreover, when the construction of the (b) (4) began on (b) (4) your firm continued to produce sterile drug products in the (b) (4) Clean Room without adequate controls in place to protect the production environment in this area. In addition, you did not increase your environmental monitoring frequency to verify that the environment remained suitable for aseptic production during construction.

OBSERVATION 4
Your firm produced sterile drug products within the (b) (4) Clean Room during pressure differential failures on 5/25/16, 5/26/16, 5/27/16, 5/31/16, 6/8/16 and 6/9/16. Your firm placed the following note next to the failed readings, "task needs to reflect positive pressure not negative," but the log where all these readings are recorded states (b) (4) Pressure Differential Testing (negative pressure).

In addition, your pressure differential log does not identify which area the pressure readings are taken from (b) (4) and will not provide you with meaningful data about the quality of

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
		Jessica L. Pressley, Drug Investigator Meredith M. Cobb, Consumer Safety Officer	09/13/2016

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA Florida District 555 Winderley Place, Suite 200 Maitland FL 32751 (407) 475-4700 Industry Information: www.fda.gov/oc/industry	8/29-9/2/16 & 9/13/16
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your aseptic processing environment.

OBSERVATION 5
Hazardous and non-hazardous drugs were produced in the same area without providing adequate containment, segregation, and/or cleaning of work surfaces, utensils, and/or personnel to prevent cross-contamination.

Specifically, your firm produces chemotherapy drugs, non-hazardous drugs and hazardous drug products in (b) (4) Clean Room on the same day without evidence to show adequate controls and cleaning were followed between batches to prevent cross contamination. This practice is evident by the following example:

On 7/7/16, your firm produced:
Progesterone in Sesame Oil 150mg/mL inj. (Qty.: (b) (4) lot # 07072016@7 (hazardous drug)
Trimix 30mg/4mg/40mcg inj. (Qty.: (b) (4) lot # 07072016@111 (non-hazardous drug)
Mitomycin, lyophilized 40 mg inj. (Qty.: (b) (4) lot # 07072016@94 (chemotherapy drug)
Alprostadil 10mcg/mL inj. (Qty.: (b) (4) lot # 07072016@112 (non-hazardous drug)

OBSERVATION 6
On 07/12/16, dead insects and fungal growth were found in the ISO 7 annex room during cleaning. This area had been previously cleaned on 07/11/16. The corrections taken by your firm to address this finding did not include an evaluation of your pest control and disinfection programs.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
	Jessica L. Pressley	Jessica L. Pressley, Drug Investigator Meredith M. Cobb, Consumer Safety Officer	09/13/2016

EXHIBIT D

Wells Pharmacy Network LLC 11/10/14

Department of Health and Human Services

Public Health Service
Food and Drug Administration
Florida District
555 Winderley Place, Suite 200
Maitland, Florida 32751

Telephone: 407-475-4700
FAX: 407-475-4770

VIA UPS NEXT DAY AIR
w/ DELIVERY CONFIRMATION

WARNING LETTER
FLA-15-07
November 10, 2014

Benjamin H. David, President
CEO
Wells Pharmacy Network, LLC
3420 Fairlane Farms Road, Suite 300
Wellington, FL 33414

Dear Mr. David:

From July 22, 2013, to July 26, 2013, from February 21, 2014, to March 7, 2014, and from May 30, 2014 to June 19, 2014, U.S. Food and Drug Administration (FDA) investigators conducted inspections of your facility, Wells Pharmacy Network, LLC, located at 1210 SW 33rd Avenue, Ocala, FL 34474. During the

inspections, the investigators noted that you were not receiving valid prescriptions for individually-identified patients for a portion of the drug products you were producing. In addition, the investigators observed serious deficiencies in your practices for producing sterile drug products, which could lead to contamination of the products, which put patients at risk. For example, we observed your technicians wearing non-sterile gowns while performing aseptic operations and documented that your firm does not use sporicidal agents to disinfect the ISO-5 areas. We also documented that your firm fails to perform **(b)(4)** on the non-pharmaceutical grade **(b)(4)** used to sterilize some of your injectable products and consequently lacked assurance that these **(b)(4)** were suitable for intended use. Therefore your products may be produced in an environment that poses a significant contamination risk. FDA issued a Form FDA 483 to your firm on July 26, 2013, March 7, 2014, and June 19, 2014.

Based on these inspections, it appears that you are producing drugs that violate the Federal Food, Drug, and Cosmetic Act (FDCA).

A. Compounded Drugs Under the FDCA

When FDA inspected your facility in July 2013, there were conflicting judicial decisions regarding the applicability of section 503A of the FDCA [21 U.S.C. § 353a], which exempts compounded drugs from several key statutory requirements if certain conditions are met.**[1]** Nevertheless, receipt of valid prescriptions for individually-identified patients prior to distribution of compounded drugs was relevant for both section 503A of the FDCA and the agency's Compliance Policy Guide 460.200 (CPG) (2002), which was then in effect.**[2]** During this FDA inspection, investigators observed that your firm does not receive valid prescriptions for individually-identified patients for a portion of the drug products you produce. Based on this factor alone, those drugs were not entitled to the statutory exemptions for compounded drugs described in section 503A of the FDCA and did not qualify for the agency's exercise of enforcement discretion set forth in the CPG.**[3]**

Subsequent to the initial FDA inspection, Congress enacted and the President signed into law the Compounding Quality Act (CQA),[4] which amended FDCA section 503A by eliminating the advertising restrictions that had been the basis for conflicting judicial decisions. The CQA otherwise left section 503A intact, and so clarified that the remainder of section 503A, including the requirement of valid prescriptions for individually-identified patients, is applicable in every federal judicial circuit. When FDA inspected your facility in March 2014 and May 2014, the investigators noted that you still were not receiving valid prescriptions for individually identified patients for a portion of the drug products you were producing. Accordingly, the drugs you compound without valid prescriptions for individually-identified patients are not entitled to the exemptions in section 503A.**[5]**

In addition, we remind you that there are a number of other conditions that must be satisfied to qualify for the exemptions in section 503A of the FDCA.**[6]**

B. Violations of the FDCA

Because the drug products that you manufacture and distribute without valid prescriptions for individually-identified patients are not the subject of approved applications, they are unapproved new drugs and misbranded drugs in violation of sections 505(a) and 502(f)(1) of the FDCA [21 U.S.C. §§ 355(a) and 352(f)(1)], respectively. In addition, your sterile drug products are prepared, packed, or held under insanitary conditions whereby they may have been contaminated with filth, or whereby they may have been rendered injurious to health. As such, all sterile drug products you manufacture are adulterated within the meaning of section 501(a)(2)(A) of the FDCA [21 U.S.C. § 351(a)(2)(A)]. Furthermore, because you manufacture and distribute drugs without valid prescriptions for individually-identified patients, the manufacture of those drugs is also subject to FDA's Current Good Manufacturing Practice (CGMP) regulations for Finished Pharmaceuticals, Title 21, Code of Federal Regulations (CFR), Parts 210 and 211. FDA investigators observed significant CGMP violations at your facility, causing such drug product(s) to be adulterated within the meaning of section 501(a)(2)(B) of the FDCA [21 U.S.C. § 351(a)(2)(B)].

Unapproved New Drug Products

You do not have any FDA-approved applications on file for the drug products for which you have not obtained valid prescriptions for individually-identified patients. **[7]** Under sections 301(d) and 505(a) of the FDCA [21 U.S.C. §§ 331(d) and 355(a)], a new drug may not be introduced into or delivered for introduction into interstate commerce unless an application approved by FDA under section 505 of the FDCA is in effect for the drug. Your marketing of these products, or other applicable products, without an approved application violates these provisions of the FDCA.

Misbranded Drug Products

Because the drug products for which you have not obtained valid prescriptions for individually-identified patients are intended for conditions that are not amenable to self-diagnosis and treatment by individuals who are not medical practitioners, adequate directions cannot be written for them so that a layman can use these products safely for their intended uses. Consequently, their labeling fails to bear adequate directions for their intended uses, causing them to be misbranded under section 502(f)(1) of the FDCA, and they are not exempt from the requirements of section 502(f)(1) of the FDCA (*see*, *e.g.*, 21 C.F.R. 201.115). The introduction or delivery for introduction into interstate commerce of these products therefore violates sections 301(a) of the FDCA [21 U.S.C. § 331(a)]. It is a prohibited act under section 301(k) of the FDCA [21 U.S.C. § 331(k)] to do any act with respect to a drug, if such act is done while the drug is held for sale after shipment in interstate commerce of the components used to make the drug and results in the drug being misbranded.

Adulteration Charges

Additionally, FDA investigators noted that your sterile drug products were prepared, packed, or held under insanitary conditions, whereby they may have become contaminated with filth or rendered injurious to health, causing your drug products to be adulterated under section 501(a)(2)(A) of the FDCA. Examples of these conditions include technicians wearing non sterile gowns while performing aseptic operations, failure to use sporicidal agents in the ISO-5 areas, the use of non-pharmaceutical grade **(b)(4)** to sterilize aseptically-produced injectables, and failure to conduct **(b)(4)**.

FDA investigators also noted CGMP violations at your facility, causing the drug products for which you have not obtained valid prescriptions for individually-identified patients to be adulterated under section 501(a)(2)(B) of the FDCA. The violations include, for example:

1. Your firm failed to establish and follow appropriate written procedures that are designed to prevent microbiological contamination of drug products purporting to be sterile, and that include validation of all aseptic and sterilization processes (21 CFR 211.113(b)).

2. Your firm failed to establish and follow an adequate written testing program designed to assess the stability characteristics of drug products and to use results of such stability testing to determine appropriate storage conditions and expiration dates (21 CFR 211.166(a))

3. Your firm failed to establish an adequate system for cleaning and disinfecting the room and equipment to produce aseptic conditions (21 CFR 211.42(c)(10)(v)).

4. Your firm failed to establish an adequate system for monitoring environmental conditions in aseptic processing areas (21 CFR 211.42(c)(10)(iv))

5. Your firm failed to ensure that manufacturing personnel wear clothing appropriate to protect drug product from contamination (21 CFR 211.28(a)).

6. Your firm failed to establish adequate written procedures for production and process control designed to assure that the drug products you manufacture have the identity, strength, quality, and purity they purport or are represented to possess (21 CFR 211.100(a))

Under section 301(a) of the FDCA [21 U.S.C. § 331(a)] the introduction or delivery for introduction into interstate commerce of any drug that is adulterated is a prohibited act. Further, it is a prohibited act under section 301(k) of the FDCA [21 U.S.C. § 331(k)] to do any act with respect to a drug, if such act is done while the drug is held for sale after shipment in interstate commerce of the components used to make the drug and results in the drug being adulterated.

C. Corrective Actions

In your responses to the three Form FDA 483s dated August 14, 2013, March 20, 2014, and August 14, 2014, respectively, you referenced your purported compliance with United States Pharmacopeia (USP) National Formulary (NF) General Chapter <797>, “Pharmaceutical Compounding - Sterile Preparations.” As noted above, your firm has manufactured and distributed drugs without valid prescriptions for individually-identified patients, and the manufacture of such drugs is subject to FDA’s drug CGMP regulations, 21 CFR Parts 210 and 211. Should your facility continue to compound drug products without valid prescriptions for individually-identified patients, you should fully implement corrective actions that meet the minimum requirements of 21 CFR Part 211 in order to provide assurance that the drug product(s) produced by your firm conform to the basic quality standards that ensure safety, identity, strength, quality, and purity.

In addition to the issues discussed above, you should note that CGMP requires the implementation of quality oversight and controls over the manufacture of drugs, including the safety of raw materials, materials used in drug manufacturing, and finished drug products. See, FDCA, as amended by the Food and Drug Administration Safety and Innovation Act (Pub.L. 112-144, Title VII, section 711). We note that you have chosen to hire a contract testing laboratory to perform some of the required testing of your finished drug products. FDA inspected this laboratory in 2013 and observed deficiencies in its practices. If you choose to contract with a laboratory to perform some functions required by CGMP, it is essential that you select a qualified contractor, and you maintain sufficient oversight of the contractor’s operations to ensure that it is fully CGMP compliant. Regardless of whether you rely on a contract facility, you are responsible for assuring that drugs you introduce into interstate commerce are neither adulterated nor misbranded. See, 21 CFR 210.1(b), 21 CFR 200.10(b).

FDA strongly recommends that your management immediately undertake a comprehensive assessment of your manufacturing operations, including facility design, procedures, personnel, processes, materials, and systems. In particular, this review should assess your aseptic processing operations. A third party consultant with relevant sterile drug manufacturing expertise could be useful in conducting this comprehensive evaluation.

In addition, you should correct the violations of FDCA sections 501(a)(2)(A), 502(f)(1) and 505(a) noted above.

D. Conclusion

The violations cited in this letter are not intended to be an all-inclusive statement of violations at your facility. You are responsible for investigating and determining the causes of the violations identified above and for preventing their recurrence or the occurrence of other violations. It is your responsibility to ensure that your firm complies with all requirements of federal law and FDA regulations.

You should take prompt action to correct the violations cited in this letter. Failure to promptly correct these violations may result in legal action without further notice, including, without limitation, seizure and injunction. FDA may re-inspect to verify corrective actions have been completed.

Within fifteen working days of receipt of this letter, please notify this office in writing of the specific steps that you have taken to correct violations. Please include an explanation of each step being taken to prevent the recurrence of violations, as well as copies of related documentation. If you do not believe that the products discussed above are in violation of the FDCA, include your reasoning and any supporting information for our consideration. If you cannot complete corrective actions within 15 working days, state the reason for the delay and the time within which you will complete the correction. Your notification should be addressed to:

Andrea Norwood
Compliance Officer
FDA Florida District Office
U.S. Food and Drug Administration
555 Winderley River Place, Suite 200
Maitland, FL 32751

If you have questions regarding any issues in this letter, please contact our office at 407-475-4700.

Sincerely,
/S/
Susan M. Turcovski
Director, Florida District

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[1] *Compare Western States Med. Ctr. v. Shalala*, 238 F.3d 1090 (9th Cir. 2001) *with Medical Ctr. Pharm. v. Mukasey*, 536 F.3d 383 (5th Cir. 2008).
[2] The CPG set forth a non-exhaustive list of factors that FDA considered in determining whether to take enforcement action when the scope and nature of a pharmacy's activities raised concerns. This CPG has been withdrawn in light of new legislation. See below.
[3]See 21 U.S.C. § 353a(a) (granting compounded drugs statutory exemptions if, among other things, "the drug product is compounded for an identified individual patient based on the…receipt of a valid prescription order or a notation, approved by the prescribing practitioner, on the prescription order that a compounded product is necessary for the identified patient…"); CPG at 2 ("FDA recognizes that pharmacists traditionally have extemporaneously compounded and manipulated reasonable quantities of human drugs upon receipt of a valid prescription for an individually-identified patient from a licensed practitioner. This traditional activity is not the subject of this guidance.").
[4]Drug Quality and Security Act, Public Law 113-54, 127 Stat. 587 (Nov. 27, 2013).
[5]The CQA contains a number of other provisions, including new exemptions and requirements for compounders seeking to operate as outsourcing facilities. A discussion of the CQA and the agency's plans to implement the new law may be found at **http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/PharmacyCompounding/default.htm (https://web.archive.org/web/20170406034011/http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/PharmacyCompounding/default.htm)**.
[6] For example, section 503A also addresses anticipatory compounding, which includes compounding (not distribution) before receipt of a valid prescription order for an individual patient. We are not addressing anticipatory compounding here.

[7] The specific products made by your firm are drugs within the meaning of section 201(g) of the Act, [21 U.S.C. § 321(g)] because they are intended for use in the diagnosis, cure, mitigation, treatment, or prevention of diseases. Further, they are “new drugs” within the meaning of section 201(p) of the FDCA [21 U.S.C. § 321(p)] because they are not generally recognized as safe and effective for their labeled uses.

More in 2014 (/web/20170406034011/https://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2014/default.htm)