



OHIO STATE BOARD OF PHARMACY

77 South High Street, Room 1702; Columbus, OH 43215-6126

-Equal Opportunity Employer and Service Provider-

TEL: 614/466-4143

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FAX: 614/752-4836

TTY/TDD: Use the Ohio Relay Service: 1-800/750-0750

URL: <http://www.pharmacy.ohio.gov>

SETTLEMENT AGREEMENT WITH THE STATE BOARD OF PHARMACY

in the matter of:

CARDINAL HEALTH 110, INC.

14601 County Road 212

Findlay, Ohio 45840

Ohio Wholesale Distributor of Dangerous Drugs License No. 01-1438400;
Wholesaler of Controlled Substance License No. W-2172

This Settlement Agreement ("Agreement") is entered into by and between Cardinal Health 110, Inc. and the Ohio State Board of Pharmacy ("Board"), a state agency charged with enforcing the Pharmacy Practice Act and Dangerous Drug Distribution Act, Chapter 4729. of the Ohio Revised Code.

Cardinal Health 110, Inc. enters into this Agreement being fully informed of its rights afforded under Chapter 119. of the Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudication hearing on the issues contained herein.

Cardinal Health 110, Inc. is knowingly and voluntarily acknowledging that, in order to settle the disciplinary charges that were filed by the Board against it and in order to obviate the need to conduct an administrative hearing to consider possible disciplinary sanctions against Cardinal Health 110, Inc.'s license to sell controlled substances and dangerous drugs subject to abuse in the State of Ohio, this Agreement is entered into on the basis of the following stipulations, admissions, and understandings:

The Ohio State Board of Pharmacy is empowered by Section 4729.56 of the Ohio Revised Code to suspend, revoke, or refuse to renew any registration certificate issued to a wholesale distributor of dangerous drugs pursuant to section 4729.52 of the Ohio Revised Code or may impose a monetary penalty on the license holder for violation of any of the enumerated grounds.

Cardinal Health 110, Inc. neither admits nor denies the allegations pending in the Board's investigation; however, the Board has initiated and conducted an investigation pursuant to the mandate of Sections 3719.18 and 4729.25 of the Ohio Revised Code.

Cardinal Health 110, Inc. acknowledges that it has been made aware of the investigation and has not failed to cooperate in said investigation.

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of holding a 119. hearing at this time, Cardinal Health 110, Inc. knowingly and voluntarily agrees to pay the sum of One Hundred Five Thousand U.S. dollars (\$105,000) within thirty days of the execution by all parties of this Agreement. This sum will be made payable to the "Treasurer, State of Ohio" and mailed to the State

Board of Pharmacy, 77 South High Street, 17th Floor, Columbus, Ohio 43266-0320. In addition, as of the effective date of this Agreement, Cardinal Health 110, Inc. shall establish and maintain a Suspicious Order Monitoring (SOM) program as described in Attachment 1 of this Agreement to assist Cardinal Health 110, Inc. in fulfilling its obligations to identify and report to the Board suspicious orders as required under Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code.

Cardinal Health 110, Inc. acknowledges that it has had an opportunity to ask questions concerning the terms of this Agreement and that all questions asked have been answered in a satisfactory manner.

Cardinal Health 110, Inc. waives any and all claims or causes of action it may have against the State of Ohio or the Board, and members, officers, employees, and/or agents of either, arising out of matters which are the subject of this Agreement. Cardinal Health 110, Inc. waives any rights of appeal pursuant to Chapter 119. of the Ohio Revised Code.

Subject to the terms of this Agreement, and conditioned upon Cardinal Health 110, Inc.'s completing in full the payment as described above, the Ohio State Board of Pharmacy (on behalf of itself, its officers, agents, agencies and departments) agrees to release Cardinal Health 110, Inc., its employees, its current and former parent and affiliated entities from any and all claims and causes of action the Board has asserted, could have asserted, or may have asserted in the future under the statutes for the events and occurrences described in the Recitals section above and/or set forth in the Notice of Opportunity for Hearing dated May 27, 2008, and issued to Cardinal Health 110, Inc. by the Ohio State Board of Pharmacy. In addition, the Board shall release all Cardinal Health entities licensed with the Board as Wholesaler Distributors of Dangerous Drugs and/or Wholesalers of Controlled Substances as defined under Sections 4729.01 and 3719.01 of the Ohio Revised Code from any and all civil administrative actions arising from violations of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code and, if proven, constitute violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code, wherein said violations have occurred or have been alleged to occur before the effective date of this Agreement.

This Settlement Agreement shall be considered a public record, as that term is used in Section 149.43 of the Ohio Revised Code, and shall become effective upon the date of the Board President's signature below.

<hr/> Cardinal Health 110, Inc., Respondent	<hr/> 07/08/2008 Date Signed
<hr/> Robert P. Giacalone, Sr. V.P. and Chief Regulatory Counsel for Respondent	<hr/> 07/08/2008 Date Signed
<hr/> Nathan S. Lypsic, R.Ph., President, Ohio State Board of Pharmacy	<hr/> 07/08/2008 Date Signed
<hr/> Sally Ann Steuk, Ohio Assistant Attorney General	<hr/> 07/09/2008 Date Signed

Suspicious Order Monitoring System

The Cardinal Health Suspicious Order Monitoring System (“SOM”) is designed to meet Cardinal Health’s regulatory obligations as established in Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code and Title 21 CFR §1301.74. Please note that the SOM program described below may be modified in the future for purposes of enhancing and/or improving the existing system. However, such enhancement(s) shall not adversely affect the identification and reporting capabilities of this SOM program. In addition, SOM program described below outlines the key components of this program and not necessarily all components.

Suspicious Order Monitoring System – Organization

The SOM is organized within the Cardinal Health Compliance Department, headed by the Chief Compliance Officer (“CCO”). Reporting to the CCO is a Senior Vice President, Supply Chain Integrity and Regulatory Operations. Directly responsible for the operation of the SOM is a Vice President of Anti-Diversion and Supply Chain Integrity. The Anti-Diversion SOM Team is further built around two Directors who have significant pharmacy-related experience. The team is then structured around six investigators; four of whom are field based.

In addition to the direct SOM Team, the field Quality and Regulatory Compliance Managers for the pharmaceutical distribution business have been organizationally realigned to report within the Quality and Regulatory Affairs (“QRA”) group that is now a part of the Ethics and Compliance Department. As a result, there is a dedicated field Compliance Manager located in each of the 24 pharmaceutical distribution facilities that distribute controlled substances.

Suspicious Order Monitoring System – Processes

The SOM is functionally organized into key processes:

- Know Your Customer
- Electronic Monitoring
- Account Investigation
- Reporting

The Know Your Customer [KYC] process involves:

- direct communication and/or on-site visits with all new customers and those existing customers where ordering patterns may raise questions are performed on a routine basis by Cardinal Health sales team members and QRA Compliance Managers. The Anti-Diversion SOM Team members also conduct direct communication and on-site visits where warranted.
- the completion of the New Pharmacy Customer Questionnaire. This questionnaire is to elicit information that can be verified with Boards of Pharmacy and Boards of Medicine regarding the principals involved in the

pharmacy and those that generate the majority of the prescriptions that are dispensed at the pharmacy.

- an evaluation of historical non-HIPAA¹ dispensing data, if available, or past controlled substances purchasing data for an assessment of the volume of controlled substances that was dispensed or purchased by this potential customer from a prior wholesaler. This provides information as to the seasonality of the purchasing patterns and, if available, assists in the refinement of the thresholds discussed later.
- This questionnaire as well as other relevant information forms the basis for the decision whether to conduct additional due diligence and ultimately to engage in a business relationship with a potential customer. Potential customers whose data and information lead to a conclusion that sales of controlled substances constitute an unreasonable risk of diversion are not permitted to purchase controlled substances.

The electronic monitoring process involves:

- the establishment of ordering thresholds. To date, the threshold setting process has involved at least a 3 step process. The first step is to group customers into specific classes of trade (e.g., we have completed this process with retail independent accounts) and then divide them into further subclasses based upon dollar volume. The average for each of these subclasses is calculated and a multiplier is assigned depending upon the schedule and class of the drug. This forms the initial rough approximation of the threshold. The second step is a further refinement to this process for all new customers and for existing customers that trigger and/or may trigger a threshold. This step involves taking the customer's individual purchasing pattern and calculating a monthly average and the standard deviation for the purchasing pattern and adding a multiplier of the standard deviation to the average. The threshold calculated from the first step is compared with the threshold from the second step. The third step is to have a pharmacist analyze the controlled substances thresholds established by each of the methods to see whether there appears to be any anomalies in the data to suggest the potential for drug diversion. If no anomalies are identified, the controlled substances threshold is established. Anomalies identified result in the establishment of a narrow threshold and an on-site investigation by the Anti-Diversion Team.
- the accumulation and blocking of orders. The electronic monitoring system accumulates orders for controlled substances by DEA base code. When the total accumulation of orders exceeds the threshold amount [the identify process], the order and any subsequent order for controlled substances from that family are blocked for the remainder of the month unless the threshold is raised.
- the analysis and reporting of suspicious orders. The first time an order is blocked a Threshold questionnaire is sent to the customer to request an explanation of the threshold order. The information requested is essentially the same information as is requested on the New Customer Questionnaire. The information supplied is then analyzed and verified by the Anti-Diversion

¹ Dispensing data requested from a pharmacy, if available from that pharmacy, will pertain to data that does not contain protected health information (PHI).

Team. If the information provided supports a rational basis for an increase in the threshold, the order is released and the threshold is increased. If the information provided substantiates a one-time need for the controlled substance, the order is released but the threshold is not increased. If the information provided does not substantiate the need for the controlled substance, the order is cancelled, a site visit may be requested and depending upon the analysis by the Anti-Diversion SOM Team of the information obtained, the order may be reported to the DEA and the State Board of Pharmacy as suspicious if it is deemed to be such. Upon further evaluation the customer may be terminated from purchasing any controlled substance where the information provided taken in its totality leads to a conclusion that the continued sales of controlled substances constitutes an unreasonable risk for the diversion of controlled substances from the customer.

- the accumulation of orders for other dangerous drugs subject to abuse as defined by state regulation or Board order undergo a similar analysis and reporting to the Board as described above for controlled substances.

The account investigation process involves:

- the use of field and headquarters staff to visit the customer and seek to discover whether there is evidence of suspicious conduct involving the dispensing of controlled substances;
- the analysis of Internet sites to determine whether there is open and notorious evidence of suspicious conduct on the part of the customer;
- the analysis of the disciplinary history of the pharmacy and principals of the pharmacy including state and federal agencies from resources that are readily available;

The reporting process involves:

- two types of reporting. The first report is a report of orders that meet the plain meaning of the regulation without any inquiry into the order. The regulation requires reports of suspicious orders of:
 - unusual size
 - unusual frequency
 - unusual pattern

The second report is a report of orders where the nature of the order itself or the historical information results in the conclusion that continued shipment of controlled substances to the customer constitutes an unreasonable risk of diversion of controlled substances and that the customer is precluded from the purchase of any controlled substance.

- the report is to be faxed to the field office of the DEA and to the state Board of Pharmacy.



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NOTICE OF OPPORTUNITY FOR HEARING

STATE'S EXHIBITS

1

May 27, 2008

Cardinal Health 110, Inc.
c/o Brian E. Mast
14601 County Road 212
Findlay, Ohio 45840

Re: Ohio Wholesale Distributor of Dangerous
Drugs License No. 01-1438400;
Wholesaler of Controlled Substance License
No. W-2172

Dear Mr. Mast:

YOU ARE HEREBY NOTIFIED that, in accordance with the provisions of Chapters 119., 3719., and 4729. of the Ohio Revised Code, the Ohio State Board of Pharmacy will determine whether or not to take action, and that Cardinal Health, is entitled to a hearing before the Ohio State Board of Pharmacy, on the bases of the following allegations:

- (1) Records of the Board of Pharmacy indicate that you are the responsible person at Cardinal Health 110, Inc., 14601 County Road 212, Findlay, Ohio; Ohio Wholesale Distributor of Dangerous Drugs License No. 01-1438400; Wholesaler of Controlled Substance License No. W-2172, pursuant to Section 4729. of the Ohio Revised Code within the meaning of Section 4729.56 of the Ohio Revised Code.
- (2) Records further indicate that Cardinal Health did, on or about December 13, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1312084, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	7X100 tablets
hydrocodone/APAP 10/325 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (3) Cardinal Health did, on or about December 14, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1317801, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	15X100 tablets
hydrocodone/APAP 10/500 mg	10X100 tablets
hydrocodone/APAP 7.5/750 mg	2X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (4) Cardinal Health did, on or about December 15, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1324144, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	10X100 tablets
diazepam 10 mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (5) Cardinal Health did, on or about December 18, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1329617, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	45x100 tablets
hydrocodone/APAP 10/500 mg	15X100 tablets
hydrocodone/APAP 7.5/500 mg	7X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (6) Cardinal Health did, on or about December 18, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold

to Caringwell Pharmacy, Inc., pursuant to invoice number 1329625, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2mg	5x100 tablets
hydrocodone/APAP 10/325 mg	1X500 tablets
hydrocodone/APAP 10/650 mg	5X100 tablets
hydrocodone/APAP 7.5/750 mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (7) Cardinal Health did, on or about December 18, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1332723, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (8) Cardinal Health did, on or about December 19, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1337922, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	7X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (9) Cardinal Health did, on or about December 20, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1344109, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (10) Cardinal Health did, on or about December 20, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1345064, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	50X100 tablets
hydrocodone/APAP 10/500 mg	30X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (11) Cardinal Health did, on or about December 21, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1351059, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	9X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (12) Cardinal Health did, on or about December 21, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1352691, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (13) Cardinal Health did, on or about December 22, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1357540, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	10X100 tablets
diazepam 10 mg	10x100 tablets
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/650 mg	3X100 tablets
hydrocodone/APAP 7.5/750 mg	4X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (14) Cardinal Health did, on or about December 26, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1361106, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	20X100 tablets
diazepam 10 mg	10X100 tablets
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets
hydrocodone/APAP 7.5/750 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (15) Cardinal Health did, on or about December 27, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1372592, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	2X500 tablets
hydrocodone/APAP 10/500 mg	8X100 tablets
hydrocodone/APAP 10/650 mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

Cardinal Health 110, Inc.

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- (16) Cardinal Health did, on or about December 27, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1373396, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	18X500 tablets
hydrocodone/APAP 10/500 mg	25X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (17) Cardinal Health did, on or about December 28, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1376965, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/650 mg	2X100 tablets
hydrocodone/APAP 7.5/500 mg	15X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (18) Cardinal Health did, on or about December 28, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1377139, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/650 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (19) Cardinal Health did, on or about December 29, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1383599, the following controlled substances:

Cardinal Health 110, Inc.

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<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	10X100 tablets
hydrocodone/APAP 7.5/750 mg	10x100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (20) Cardinal Health did, on or about December 29, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1384004, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (21) Cardinal Health did, on or about December 29, 2006, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1384116, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	7X100 tablets
hydrocodone/APAP 10/500 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (22) Cardinal Health did, on or about January 2, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1393169, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	12X100 tablets
diazepam 10 mg	10x100 tablets
hydrocodone/APAP 10/325 mg	10X500 tablets
hydrocodone/APAP 10/500 mg	7X100 tablets
hydrocodone/APAP 7.5/750 mg	5X100 tablets

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The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (23) Cardinal Health did, on or about January 3, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1400322, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	1X500 tablets
hydrocodone/APAP 10/500 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (24) Cardinal Health did, on or about January 3, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1400422, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	9X500 tablets
hydrocodone/APAP 10/500 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (25) Cardinal Health did, on or about January 3, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1400488, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	3X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

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- (26) Cardinal Health did, on or about January 4, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1406076, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (27) Cardinal Health did, on or about January 5, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1413578, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	1X500 tablets
hydrocodone/APAP 10/650 mg	2X100 tablets
hydrocodone/APAP 7.5/750 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (28) Cardinal Health did, on or about January 5, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1413580, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	7X100 tablets
diazepam 10 mg	7X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (29) Cardinal Health did, on or about January 8, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1422514, the following controlled substances:

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<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	7X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (30) Cardinal Health did, on or about January 8, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1422518, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	7X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (31) Cardinal Health did, on or about January 9, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1428270, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	15X100 tablets
hydrocodone/APAP 10/325 mg	7X100 tablets
hydrocodone/APAP 10/500 mg	3X100 tablets
hydrocodone/APAP 10/650 mg	9X100 tablets
hydrocodone/APAP 7.5/500 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (32) Cardinal Health did, on or about January 9, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1428744, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (33) Cardinal Health did, on or about January 10, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1433867, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
diazepam 10 mg	6X100 tablets
hydrocodone/APAP 10/325 mg	6X500 tablets
hydrocodone/APAP 10/650 mg	2X500 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (34) Cardinal Health did, on or about January 10, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1433938, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	10X100 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (35) Cardinal Health did, on or about January 11, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1439760, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of

the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (36) Cardinal Health did, on or about January 11, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1439875, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/650 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (37) Cardinal Health did, on or about January 12, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1446703, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (38) Cardinal Health did, on or about January 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1451488, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (39) Cardinal Health did, on or about January 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1451495, the following controlled substances:

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

(40) Cardinal Health did, on or about January 16, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Carlingwell Pharmacy, Inc., pursuant to invoice number 1460896, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	7X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

(41) Cardinal Health did, on or about January 17, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Carlingwell Pharmacy, Inc., pursuant to invoice number 1466434, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
diazepam 10 mg	4X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

(42) Cardinal Health did, on or about January 17, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Carlingwell Pharmacy, Inc., pursuant to invoice number 1466503, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	6X500 tablets
hydrocodone/APAP 10/500 mg	6X100 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (43) Cardinal Health did, on or about January 18, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1473204, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (44) Cardinal Health did, on or about January 19, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1478708, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	8X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (45) Cardinal Health did, on or about January 19, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1478967, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	4X500 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

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- (46) Cardinal Health did, on or about January 22, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1484176, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	4X500 tablets
hydrocodone/APAP 10/500 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (47) Cardinal Health did, on or about January 23, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1492735, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	4X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (48) Cardinal Health did, on or about January 25, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1504853, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	5X100 tablets
diazepam 10 mg	8X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (49) Cardinal Health did, on or about January 25, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1505780, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	6X500 tablets
hydrocodone/APAP 10/500 mg	4X500 tablets
hydrocodone/APAP 10/650 mg	5X100 tablets
hydrocodone/APAP 7.5/500 mg	1X500 tablets
hydrocodone/APAP 7.5/750 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (50) Cardinal Health did, on or about January 30, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1525113, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	6X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (51) Cardinal Health did, on or about January 30, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1525158, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	10X500 tablets
hydrocodone/APAP 10/500 mg	3X500 tablets
hydrocodone/APAP 7.5/500 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (52) Cardinal Health did, on or about February 1, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1537234, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/650 mg	5X100 tablets

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<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 7.5/500 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (53) Cardinal Health did, on or about February 2, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1544106, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	4X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (54) Cardinal Health did, on or about February 2, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1544154, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (55) Cardinal Health did, on or about February 5, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1549686, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	3X500 tablets
hydrocodone/APAP 10/500 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of

the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (56) Cardinal Health did, on or about February 6, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1557645, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	10X100 tablets
hydrocodone/APAP 10/500 mg	2X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (57) Cardinal Health did, on or about February 6, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1558199, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	4X500 tablets
hydrocodone/APAP 10/650 mg	2X100 tablets
hydrocodone/APAP 7.5/500 mg	1X500 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (58) Cardinal Health did, on or about February 7, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1563951, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (59) Cardinal Health did, on or about February 8, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1569746, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	6X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (60) Cardinal Health did, on or about February 8, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1570153, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	2X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets
hydrocodone/APAP 10/650 mg	7X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (61) Cardinal Health did, on or about February 9, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1576027, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	5X100 tablets
diazepam 10 mg	7X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (62) Cardinal Health did, on or about February 9, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1576615, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	6X500 tablets
hydrocodone/APAP 10/500 mg	1X500 tablets
hydrocodone/APAP 10/650 mg	12X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (63) Cardinal Health did, on or about February 12, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1584116, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (64) Cardinal Health did, on or about February 12, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1584120, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	4X500 tablets
hydrocodone/APAP 10/500 mg	2X500 tablets
hydrocodone/APAP 10/650 mg	3X500 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (65) Cardinal Health did, on or about February 13, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1590531, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	4X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (66) Cardinal Health did, on or about February 13, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1590637, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	5X500 tablets
hydrocodone/APAP 10/650 mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (67) Cardinal Health did, on or about February 13, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1590778, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	7X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (68) Cardinal Health did, on or about February 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1595960, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	4X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

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- (69) Cardinal Health did, on or about February 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1596041, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (70) Cardinal Health did, on or about February 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1596642, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	4X500 tablets
hydrocodone/APAP 10/650 mg	6X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (71) Cardinal Health did, on or about February 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1600648, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	4X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (72) Cardinal Health did, on or about February 16, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1607171, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	5X100 tablets
diazepam 10 mg	5X100 tablets
hydrocodone/APAP 10/650 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (73) Cardinal Health did, on or about February 16, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1607207, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	7X500 tablets
hydrocodone/APAP 10/650 mg	10X100 tablets
hydrocodone/APAP 7.5/750 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (74) Cardinal Health did, on or about February 19, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1612171, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	15X100 tablets
hydrocodone/APAP 10/650 mg	8X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (75) Cardinal Health did, on or about February 19, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1612174, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	6X500 tablets
hydrocodone/APAP 7.5/500 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (76) Cardinal Health did, on or about February 20, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1622402, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	22X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (77) Cardinal Health did, on or about February 21, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1626674, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	6X100 tablets
diazepam 10 mg	8X100 tablets
hydrocodone/APAP 10/325 mg	12X500 tablets
hydrocodone/APAP 7.5/750 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (78) Cardinal Health did, on or about February 21, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1626790, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	10X500 tablets
hydrocodone/APAP 10/650 mg	10X100 tablets

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 7.5/500 mg	1X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (79) Cardinal Health did, on or about February 22, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1632771, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	15X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (80) Cardinal Health did, on or about February 22, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1632823, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	5X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (81) Cardinal Health did, on or about February 23, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1637370, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	6X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (82) Cardinal Health did, on or about February 23, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1638925, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	4X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (83) Cardinal Health did, on or about February 26, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1643149, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	10X100 tablets
diazepam 10 mg	15X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (84) Cardinal Health did, on or about February 26, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1643268, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	9X500 tablets
hydrocodone/APAP 10/500 mg	15X500 tablets
hydrocodone/APAP 10/650 mg	10X100 tablets
hydrocodone/APAP 7.5/500 mg	5X500 tablets
hydrocodone/APAP 7.5/750 mg.	20X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (85) Cardinal Health did, on or about February 27, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold

to Caringwell Pharmacy, Inc., pursuant to invoice number 1653163, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	15X500 tablets
hydrocodone/APAP 10/650 mg	10X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (86) Cardinal Health did, on or about February 27, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1653174, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	12X500 tablets
hydrocodone/APAP 10/500 mg	8X500 tablets
hydrocodone/APAP 10/650 mg	10X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (87) Cardinal Health did, on or about February 28, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1658558, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	20X100 tablets
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	4X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (88) Cardinal Health did, on or about March 1, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1664793, the following controlled substances:

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<u>Drug/Strength</u>	<u>Quantity</u>
diazepam 10 mg	10X100 tablets
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	4X500 tablets
hydrocodone/APAP 10/650 mg	9X100 tablets
hydrocodone/APAP 10/650 mg	2X500 tablets
hydrocodone/APAP 7.5/750 mg	2X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (89) Cardinal Health did, on or about March 3, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1673415, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2mg	15X100 tablets
hydrocodone/APAP 10/325 mg	5X500 tablets
hydrocodone/APAP 10/500 mg	4X500 tablets
hydrocodone/APAP 10/650 mg	10X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (90) Cardinal Health did, on or about March 5, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1675684, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	4X500 tablets
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	15X500 tablets
hydrocodone/APAP 10/650 mg	7X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (91) Cardinal Health did, on or about March 6, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to

Caringwell Pharmacy, Inc., pursuant to invoice number 1685132, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	5X500 tablets
hydrocodone/APAP 10/325 mg	13X500 tablets
hydrocodone/APAP 10/500 mg	10X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (92) Cardinal Health did, on or about March 7, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1690176, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	3X500 tablets
diazepam 10 mg	15X100 tablets
hydrocodone/APAP 10/325 mg	15X500 tablets
hydrocodone/APAP 10/650 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (93) Cardinal Health did, on or about March 8, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1696783, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	8X500 tablets
hydrocodone/APAP 10/650 mg	10X100 tablets
hydrocodone/APAP 10/650 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (94) Cardinal Health did, on or about March 9, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to

Caringwell Pharmacy, Inc., pursuant to invoice number 1702803, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	10X500 tablets
diazepam 10 mg	10X100 tablets
hydrocodone/APAP 10/325 mg	25X500 tablets
hydrocodone/APAP 10/500 mg	10X500 tablets
hydrocodone/APAP 10/650 mg	10X100 tablets
hydrocodone/APAP 10/650 mg	6X500 tablets
hydrocodone/APAP 7.5/750 mg	6X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (95) Cardinal Health did, on or about March 12, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1707696, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	10X500 tablets
hydrocodone/APAP 10/325 mg	40X500 tablets
hydrocodone/APAP 10/500 mg	15X500 tablets
hydrocodone/APAP 10/650 mg	10X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (96) Cardinal Health did, on or about March 13, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1717144, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	4X500 tablets
hydrocodone/APAP 7.5/500 mg	4X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (97) Cardinal Health did, on or about March 14, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1723250, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
diazepam 10 mg	15X100 tablets
hydrocodone/APAP 10/325 mg	40X500 tablets
hydrocodone/APAP 10/500 mg	10X500 tablets
hydrocodone/APAP 10/650 mg	10X500 tablets
hydrocodone/APAP 7.5/750 mg	4X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (98) Cardinal Health did, on or about March 15, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1729682, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	4X500 tablets
hydrocodone/APAP 10/500 mg	6X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (99) Cardinal Health did, on or about March 16, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1736642, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	7X500 tablets
diazepam 10 mg	6X100 tablets
hydrocodone/APAP 10/325 mg	40X500 tablets
hydrocodone/APAP 10/500 mg	20X500 tablets
hydrocodone/APAP 10/650 mg	15X500 tablets
hydrocodone/APAP 7.5/500 mg	3X500 tablets
hydrocodone/APAP 7.5/750 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of

the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (100) Cardinal Health did, on or about March 19, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1740456, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/500 mg	14X500 tablets
hydrocodone/APAP 10/650 mg	12X100 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (101) Cardinal Health did, on or about March 19, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1743193, the following controlled substance:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	15X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (102) Cardinal Health did, on or about March 20, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1749204, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
diazepam 10 mg	10X100 tablets
hydrocodone/APAP 10/650 mg	8X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (103) Cardinal Health did, on or about March 21, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to

Caringwell Pharmacy, Inc., pursuant to invoice number 1755599, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	6X500 tablets
diazepam 10 mg	7X100 tablets
hydrocodone/APAP 10/325 mg	40X500 tablets
hydrocodone/APAP 10/500 mg	15X500 tablets
hydrocodone/APAP 10/650 mg	6X500 tablets
hydrocodone/APAP 7.5/750 mg	3X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (104) Cardinal Health did, on or about March 26, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1772149, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	7X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (105) Cardinal Health did, on or about March 27, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to Caringwell Pharmacy, Inc., pursuant to invoice number 1780644, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
hydrocodone/APAP 10/325 mg	20X500 tablets
hydrocodone/APAP 10/500 mg	8X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

- (106) Cardinal Health did, on or about March 28, 2007, fail to inform the Ohio State Board of Pharmacy of a suspicious order for a drug. On this date, Cardinal Health sold to

Caringwell Pharmacy, Inc., pursuant to invoice number 1787047, the following controlled substances:

<u>Drug/Strength</u>	<u>Quantity</u>
alprazolam 2 mg	3X500 tablets
hydrocodone/APAP 10/325 mg	22X500 tablets
hydrocodone/APAP 10/500 mg	5X500 tablets

The above order was suspicious because, in relation to the wholesaler's records as a whole, it was of unusual size, unusual frequency, or deviated substantially from established buying patterns. Such conduct is in violation of Rule 4729-9-16(H)(1)(e) of the Ohio Administrative Code, and if proven constitutes violating a rule of the Board within the meaning of Section 4729.56 of the Ohio Revised Code.

For these reasons, the State Board of Pharmacy will determine whether to take action pursuant to Sections 3719.03 and 4729.56 of the Ohio Revised Code.

YOU ARE HERBY ADVISED that Section 3719.03 of the Ohio Revised Code provides in pertinent part: The Board may suspend or revoke, for cause, any license issued under 3719.02 or 3719.021 of the Ohio Revised Code.

YOU ARE HEREBY ADVISED that Section 4729.56 of the Ohio Revised Code provides in pertinent part:

(A) In accordance with Chapter 119. of the Ohio Revised Code, the board of pharmacy may suspend, revoke, or refuse to renew any registration certificate issued to a wholesale distributor of dangerous drugs pursuant to section 4729.52 of the Revised Code or may impose a monetary penalty of forfeiture not to exceed in severity any fine designated under the Revised Code for a similar offense or one thousand dollars if the acts committed are not classified as an offense by the Revised Code for any of the following causes:

(1) Making any false material statements in an application for registration as a wholesale distributor of dangerous drugs;

(2) Violating any federal, state, or local drug law; any provision of this chapter or Chapter 2925., 3715., or 3719., of the Revised Code; or any rule of the board;

(3) A conviction of a felony;

(4) Ceasing to satisfy the qualifications for registration under section 4729.53 of the Revised Code or the rules of the board.

YOU ARE FURTHER NOTIFIED, in accordance with the provisions of Chapters 119., 3719., and 4729. of the Ohio Revised Code, that you are entitled to a hearing before the Ohio State Board of Pharmacy, if you request such a hearing within thirty (30) days of the time of the mailing of this notice.

Cardinal Health 110, Inc.

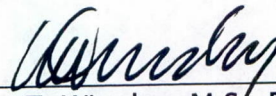
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Notice of Opportunity

IF YOU DESIRE A HEARING, such request shall be mailed to the State Board of Pharmacy, 77 South High Street, Room 1702, Columbus, Ohio 43215-6126. YOUR REQUEST MUST BE IN WRITING, AND MUST BE RECEIVED IN THE OFFICE OF THE OHIO STATE BOARD OF PHARMACY ON OR PRIOR TO THE THIRTIETH (30TH) DAY FOLLOWING THE MAILING DATE OF THIS NOTICE. You may appear at such hearing in person, by your attorney, or by such other representative as is permitted to practice before the agency, or you may present your position, arguments or contentions in writing; and, at this hearing, you may also present evidence and examine any witnesses appearing for and against you.

YOU ARE FURTHER ADVISED that if there is no request for such a hearing received by the Board on or prior to the thirtieth (30th) day following the mailing of this notice, the Ohio State Board of Pharmacy, upon consideration of the aforementioned allegations against you, may take action without such a hearing.

BY ORDER OF THE STATE BOARD OF PHARMACY



William T. Winsley, M.Sc., R.Ph.
Executive Director

WTW:lp (D-080527048)

CERTIFIED MAIL / Return Receipt
7004 2510 0006 9804 4967

cc: Sally Ann Steuk, Assistant Attorney General