ORDER OF THE OHIO BOARD OF PHARMACY
Case Number A-2026-0301

-THIS IS A RED INK STAMP-
I certify this to be a true and exact copy of the original document on file with the Ohio State Board of Pharmacy.
Steven W. Schierholt, Esq., Executive Dir.
Date: 11/6/2026
-MUST HAVE BOARD SEAL TO BE OFFICIAL-

In The Matter Of:

CasaPharmaRx
12855 Capricorn Street
Stafford, TX 77477
License No. 02-40000438

INTRODUCTION

The Matter of CasaPharmaRx came for hearing on Tuesday, November 3, 2026, before the following members of the Ohio Board of Pharmacy (Board): Jason George, RPh, *Presiding*; T.J. Grimm, RPh, *Vice President*; Anthony Buchta, Sr., RPh; Trina Buettner, RPh; Denise Conway, RPh; Jeff Huston, RPh; Thomas Whiston, RPh; and Leonard Hubert, *Public Member*.

CasaPharmaRx was represented by Robbie Wright and Matthew Ludowig via written brief. The State of Ohio was represented by Matthew Meyer, Assistant Attorney General.

SUMMARY OF EVIDENCE

State's Witnesses:

1. Paul Schad, RPh

Respondent's Witnesses:

1. None

State's Exhibits:

1. August 26, 2026 Notice Letter
2. Service Confirmation, August 26, 2026
3. Receipt of Service, August 28, 2026
4. Hearing Scheduling Notice Email, September 25, 2026
5. Hearing Scheduling Notice Letter
6. Receipt of Service, September 25, 2026
7. Email Thread between Robbie Wright and Paul Schad, July 21, 2026 – August 7, 2026

8A-8K. Solutions Aesthetic Medicine-New Skin Weight Loss and Aesthetics Documents provided to Paul Schad

Respondent's Written Legal Arguments and Contentions:

Respondent's CasaPharmaRx's Hearing Brief and Written Evidentiary Submission

Casa Exhibits In Support of Hearing Brief

Declaration of Stan G. Louie, Pharm.D Declaration In Support of Respondent CasaPharmRx's Hearing Brief and Written Evidentiary Submission

Declaration of Jamie Carter In Support of Respondent CasaPharmaRx's Hearing Brief and Written Evidentiary Submission

Respondent's Exhibits: (The Board is including Respondent's Exhibits because the State waived its objection to the manner of the submission.)

R-1. October 29, 2026 Email

R-2. Transcript, November 17, 2025

R-3. Respondent Letter to Board, June 19, 2026

R-4. June 25, 2026 Email

R-5. Respondent Letter to Board, July 20, 2026

R-6. October 29, 2026 Email

R-7. October 30, 2026 Email

R-8. FARMAKEIO dba FarmaKeio Settlement Agreement, Notice of Opportunity for Hearing, and Attachement

R-9. Brooksville Pharmaceuticals Settlement Agreement and Notice of Opportunity for Hearing.

A. Stan G. Louie, Pharm D. – Curriculum Vitae

B. Inspection reports, standard operating procedures, certificates of analysis, analytical testing, prescriptions, and other material

FINDINGS OF FACT

After hearing the testimony, observing the demeanor of the witnesses, considering the evidence, and weighing the credibility of each, the Board finds the following to be fact:

1. On or about November 17, 2025, CasaPharmaRx's TDDD license with the Board was summarily suspended.

2. On or about July 21, 2026, a Board Compliance Specialist, pursuant to Ohio Revised Code 4729.19 and Ohio Revised Code 4729:5-8-03(J) and (K), requested records of all dangerous drugs dispensed and/or shipped into Ohio by CasaPharmaRx from November 17, 2025, through July 21, 2026. The records were to include the drug name, strength, dosage form, serial number of the prescription and quantity. Also please include full name and date of birth of the patient, residential address, including the physical address the to which the prescription was shipped.

3. On or about July 24, 2026, CasaPharmaRx notified the Board they could not provide the requested records on the date they were due (July 24, 2026). CasaPharmaRx did not request an extension. CasaPharmaRx stated they would provide their response to the records request on August 7, 2026.

4. On or about August 7, 2026, CasaPharmaRx notified the Board they could not provide the requested records on August 7, 2026 "due to competing personal and professional obligations." CasaPharmaRx did not request an extension. CasaPharmRx stated they would provide their response to the records request on August 14, 2026.

5. CasaPharmaRx did not provide the requested records on August 14, 2026. The requested records were provided to the Board on October 23, 2026.

CONCLUSIONS OF LAW

1. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-8-03 of the OAC, Compliance, as effective February 1, 2022:

    a. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy to carry out its responsibilities as a licensing, regulatory, and drug law enforcement agency of the state of Ohio, OAC Rule 4729:5-8-03(J); and

    b. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy and any local, state, or federal agency to carry out its responsibilities in enforcing the federal and state laws governing the distribution of drugs in the state of Ohio, OAC Rule 4729:5-8-03(K).

2. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, Responsible Person of a Terminal Distributor, as effective March 1, 2019, and April 25, 2022:

    a. The responsible person shall be responsible for the practice of the profession of pharmacy, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(A)(2); and

    b. The person to whom the terminal distributor of dangerous drugs license has been issued and all pharmacists on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of drugs and the practice of pharmacy, OAC Rule 4729:5-2-01(A)(3); and

    c. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC 4729:5-2-01(E)(4); and

d. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC 4729:5-2-01(E)(6).

3. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.55 of the ORC, as effective March 31, 2021, TDDD license requirements:

   a. The applicant is equipped as to land, buildings, and equipment to properly carry on the business of a terminal distributor of dangerous drugs within the category of licensure approved by the board, ORC 4729.55(A); and

   b. Adequate safeguards are assured to prevent the sale or other distribution of dangerous drugs by any person other than a pharmacist or licensed health professional authorized to prescribe drugs, ORC 4729.55(C); and

   c. Adequate safeguards are assured that the applicant will carry on the business of a terminal distributor of dangerous drugs in a manner that allows pharmacists and pharmacy interns employed by the terminal distributor to practice pharmacy in a safe and effective manner, ORC 4729.55(D).

4. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.57(B) of the ORC, as effective April 4, 2023:

   a. Violating any rule of the board, ORC Section 4729.57(B)(2); and

   b. Violating any provision of this chapter, ORC Section 4729.57(B)(3); and

   c. Ceasing to satisfy the qualifications of a terminal distributor of dangerous drugs set forth in section 4729.55 of the Revised Code, ORC Section 4729.57(B)(7); and

   d. Any other cause for which the board may impose discipline as set forth in rules adopted under section 4729.26 of the Revised Code, ORC Section 4729.57(B)(10).

5. Such conduct as set forth in Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-4-01 of the OAC, as effective April 25, 2022:

   a. Violating any rule of the board, OAC Rule 4729:5-4-01(B)(2); and

   b. Violating any provision of Chapter 4729. of the Revised Code, OAC Rule 4729:5-4-01(B)(3); and

   c. Ceasing to satisfy the qualifications of a terminal distributor of dangerous drugs set forth in section 4729.55 of the Revised Code, OAC Rule 4729:5-4-01(B)(7).

DECISION OF THE BOARD

Pursuant to Section 4729.57 of the Ohio Revised Code and Ohio Administrative Code Rule 4729:5-1-01(U), and after consideration of the record as a whole, the Ohio Board of Pharmacy adjudicates the matter of CasaPharmaRx as follows:

On the basis of the Findings of Fact and Section (1) through (5) of the Conclusions of Law, taken collectively or as individual violations, the Ohio Board of Pharmacy hereby revokes permanently the Terminal Distributor of Dangerous Drugs (TDDD) license, No. 02-40000438, held by CasaPharmaRx, effective the date of this Order.

Pursuant to 4729.57 of the Ohio Revised Code, the State of Ohio Board of Pharmacy imposes a monetary penalty in the amount of $150,000.00. This fine will be attached to the license record for CasaPharmaRx and must be paid no later than 180 days from the effective date of this Order. To pay this fine a representative of CasaPharmaRx must log in to www.elicense.ohio.gov and process the items in the cart.

Further, The Board finds the following:

1. The Board finds that Respondent purposely failed to provide records to the Board, knowing that the records would demonstrate violation of the summary suspension imposed on November 17, 2025, which prohibited Respondent from continuing to ship prescription drugs into Ohio. Respondent was notified of the suspension both verbally (see Exhibit 31 in Case No. A-2025-0363) and in writing through the Summary Suspension/Notice of Opportunity for Hearing (see Exhibit 1 in Case No. A-2025-0363). Although Respondent asserts in its Evidentiary Submission that this was an unintentional error, the Board finds this error to be serious and in willful disregard for the Board's summary suspension.

2. The Board finds that there is no current evidence of known patient harm, but such harm is not required when making the determination to summarily suspend a terminal distributor of dangerous drugs (TDDD) or to impose discipline. Rather, in deciding to summarily suspend a TDDD, the Board need only determine that there is a *danger of immediate and serious harm*. To require actual harm before acting to protect the citizens of Ohio is absurd. The Board expressly finds that the distribution of adulterated and/or misbranded drugs that are not approved for compounding is clear and convincing evidence of a danger of immediate and serious harm to others due to the method used by the terminal distributor to possess or distribute dangerous drugs and warranted suspension of Respondent's license. Further, Respondent's continued failure to comply with Ohio rules, including refusing to provide requested records for months and repeated disregard for the terms of its summary suspension by continuing to distribute drugs into Ohio, warrants license revocation.

3. Even though Respondent failed to appear in person or through counsel, the Board considered the written arguments and evidence submitted by Respondent and gave it proper weight. The Board notes that, even in its own filings, Respondent admitted to many of the allegations contained in the Notices.

Further, the Board hereby grants the State's Motion to Seal the Record in this matter including, but not limited to, all confidential patient health information contained in the record, specifically State's exhibits 8A, 8B, 8C, 8D, 8E, 8F, 8G, 8H, 8I, 8J, and 8K.

T.J. Grimm moved for Findings of Fact; Jeff Huston seconded the motion. Motion passed (Yes-7/No-0).

T.J. Grimm moved for Conclusions of Law; Jeff Huston seconded the motion. Motion passed (Yes-7/No-0).

T.J. Grimm moved for Action of the Board; Jeff Huston seconded the motion. Motion passed (Yes-7/No-0).

SO ORDERED.

It is hereby certified by this Board that the above language is a copy of the Order entered upon its journal in this case.

TIME AND METHOD TO PERFECT AN APPEAL

Any party desiring to appeal shall file a Notice of Appeal with the Ohio Board of Pharmacy, 77 South High Street, 17th Floor, Columbus, OH 43215, setting forth the order appealed from and stating that the agency's order is not supported by reliable, probative, and substantial evidence and is not in accordance with law. The notice of appeal may, but need not, set forth the specific grounds of the party's appeal beyond the statement that the agency's order is not supported by reliable, probative, and substantial evidence and is not in accordance with law. The Notice of Appeal shall also be filed by the appellant in the court of common pleas of the county in which the place of business of the licensee is located or the county in which the licensee is a resident. If the appellant is not a resident of and has no place of business in this state, the party may appeal to the court of common pleas of Franklin County. Such notices of appeal shall be filed within fifteen (15) days after the service of the notice of the Ohio Board of Pharmacy's Order as provided in Section 119.12 of the Ohio Revised Code.

BY ORDER OF THE STATE BOARD OF PHARMACY

ORDER MAILED & EFFECTIVE: **November 6, 2026**

By: Steven W. Schierholt

Steven W. Schierholt, Esq., Executive Director

SWS/jak/jrn

STATE OF OHIO BOARD OF PHARMACY

NOTICE OF OPPORTUNITY FOR HEARING
PROPOSAL TO TAKE DISCIPLINARY ACTION AGAINST LICENSEE

-THIS IS A RED INK STAMP-
I certify this to be a true and exact copy of the original document on file with the Ohio State Board of Pharmacy.
Steven W. Schierholt, Esq., Executive Dir.
Date: 8/26/2026
-MUST HAVE BOARD SEAL TO BE OFFICIAL-

IN THE MATTER OF: **CASE NO. A-2026-0301**

CasaPharmaRx **License No. 02-40000438**
12855 Capricorn Street
Stafford, TX 77477

August 26, 2026

Dear CasaPharmaRx:

You are hereby notified, in accordance with the provisions of Section 119.07 of the Ohio Revised Code the Ohio Board of Pharmacy (Board) proposes to take action against your license as a Terminal Distributor of Dangerous Drugs (TDDD) under authority of Section 4729.57 of the Revised Code.

JURISDICTION

1. Pursuant to section 4729.57 of the Ohio Revised Code and the rules adopted thereunder, the Board has the authority to suspend, revoke, restrict, limit, or refuse to grant or renew any license issued pursuant to section 4729.55 of the ORC to practice as a TDDD in the state of Ohio. Additionally, Section 4729.57 of the Ohio Revised Code grants the Board the authority to impose a monetary penalty or forfeiture not to exceed in severity any fine designated under the Revised Code for a similar offense or $1,000 if the acts committed have not been classified as an offense by the ORC.

2. CasaPharmaRx, located at 12855 Capricorn Street, Stafford, Texas, has a summarily suspended TDDD license with the Board under license number 02-40000438.

ALLEGATIONS

1. On or about November 17, 2025, CasaPharmaRx's TDDD license with the Board was summarily suspended.

2. On or about July 21, 2026, a Board Compliance Specialist, pursuant to Ohio Revised Code 4729.19 and Ohio Revised Code 4729:5-8-03(J) and (K), requested records of all dangerous drugs dispensed and/or shipped into Ohio by CasaPharmaRx from November 17, 2025, through July 21, 2026. The records were to include the drug name, strength, dosage form, serial number of the prescription and quantity. Also please include full name and date of birth of the patient, residential address, including the physical address the to which the prescription was shipped.

3. On or about July 24, 2026, CasaPharmaRx notified the Board they could not provide the requested records on the date they were due (July 24, 2026). CasaPharmaRx did not request an extension.

CasaPharmaRx stated they would provide their response to the records request on August 7, 2026.

4. On or about August 7, 2026, CasaPharmaRx notified the Board they could not provide the requested records on August 7, 2026 "due to competing personal and professional obligations." CasaPharmaRx did not request an extension. CasaPharmRx stated they would provide their response to the records request on August 14, 2026.

5. CasaPharmaRx did not provide the requested records on August 14, 2026. The requested records have not been received as of the date of this Notice of Opportunity for Hearing/Proposal to Take Disciplinary Action Against Licensee.

POTENTIAL VIOLATIONS OF LAW

1. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-8-03 of the OAC, Compliance, as effective February 1, 2022, each violation punishable by a maximum penalty of $1,000:

    a. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy to carry out its responsibilities as a licensing, regulatory, and drug law enforcement agency of the state of Ohio, OAC Rule 4729:5-8-03(J); and/or

    b. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy and any local, state, or federal agency to carry out its responsibilities in enforcing the federal and state laws governing the distribution of drugs in the state of Ohio, OAC Rule 4729:5-8-03(K).

2. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, Responsible Person of a Terminal Distributor, as effective March 1, 2019, and April 25, 2022, each violation punishable by a maximum penalty of $1,000:

    a. The responsible person shall be responsible for the practice of the profession of pharmacy, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(A)(2); and/or

    b. The person to whom the terminal distributor of dangerous drugs license has been issued and all pharmacists on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of drugs and the practice of pharmacy, OAC Rule 4729:5-2-01(A)(3).

    c. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC

4729:5-2-01(E)(4); and/or

d. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC 4729:5-2-01(E)(6).

3. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.55 of the ORC, as effective March 31, 2021, TDDD license requirements, each violation punishable by a maximum penalty of $1,000:

   a. The applicant is equipped as to land, buildings, and equipment to properly carry on the business of a terminal distributor of dangerous drugs within the category of licensure approved by the board, ORC 4729.55(A); and/or

   b. Adequate safeguards are assured to prevent the sale or other distribution of dangerous drugs by any person other than a pharmacist or licensed health professional authorized to prescribe drugs, ORC 4729.55(C); and/or

   c. Adequate safeguards are assured that the applicant will carry on the business of a terminal distributor of dangerous drugs in a manner that allows pharmacists and pharmacy interns employed by the terminal distributor to practice pharmacy in a safe and effective manner, ORC 4729.55(D); and/or

4. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.57(B) of the ORC, as effective April 4, 2023, each violation punishable by a maximum penalty of $1,000:

   a. Violating any rule of the board, ORC Section 4729.57(B)(2); and/or

   b. Violating any provision of this chapter, ORC Section 4729.57(B)(3); and/or

   c. Ceasing to satisfy the qualifications of a terminal distributor of dangerous drugs set forth in section 4729.55 of the Revised Code, ORC Section 4729.57(B)(7); and/or

   d. Any other cause for which the board may impose discipline as set forth in rules adopted under section 4729.26 of the Revised Code, ORC Section 4729.57(B)(10).

5. Such conduct as set forth in Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-4-01 of the OAC, as effective April 25, 2022, each violation punishable by a maximum penalty of $1,000:

   a. Violating any rule of the board, OAC Rule 4729:5-4-01(B)(2); and/or

b. Violating any provision of Chapter 4729. of the Revised Code, OAC Rule 4729:5-4-01(B)(3); and/or

c. Ceasing to satisfy the qualifications of a terminal distributor of dangerous drugs set forth in section 4729.55 of the Revised Code, OAC Rule 4729:5-4-01(B)(7).

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

IF YOU DESIRE A HEARING, such request shall either be mailed to the Ohio Board of Pharmacy, Attn: Legal, 77 South High Street, 17th Floor, Columbus, Ohio 43215-6126 or an e-mail request may be sent to legal@pharmacy.ohio.gov (**please note faxes will not be accepted**). **YOUR REQUEST MUST BE RECEIVED ON OR PRIOR TO THE 30TH DAY FOLLOWING THE SERVICE DATE OF THIS NOTICE.** Please note that if you submit a request via email, your request will be acknowledged within one business day of receipt. If you do not receive an acknowledgment, please contact the Board offices at 614-466-4143 and request the legal department. 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. **If you are a business entity, including but not limited to a corporation, limited liability company, or a limited partnership, you must be represented at the hearing by an attorney licensed to practice in the state of Ohio.**

YOU ARE FURTHER ADVISED that if there is no request for such a hearing received by the Board on or prior to the 30th day following the service of this notice, the Ohio Board of Pharmacy, upon consideration of the aforementioned allegations against you, may take action without such a hearing, and may adopt a final order that contains the board's findings. In the final order, the board may impose any of the sanctions listed in division RC 4729.57(A).

If you have questions regarding the Chapter 119. Administrative Hearing process, please e-mail your questions to legal@pharmacy.ohio.gov or call the Board office at 614-466-4143 and ask for the legal department.

BY ORDER OF THE OHIO BOARD OF PHARMACY

Steven W. Schierholt, Esq., Executive Director

SWS/jak/jrn

cc: Robbie Wright at rwright@kcozlaw.com
J. Scott Carr at scarr@kcozlaw.com
Aaron Wagner at awagner@kcozlaw.com

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I certify this to be a true and exact copy of the original document on file with the Ohio State Board of Pharmacy.
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Case Number A-2025-0363

In The Matter Of:

CasaPharmaRx
12855 Capricorn Street
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License No. 02-40000438

INTRODUCTION

The Matter of CasaPharmaRx came for hearing on Tuesday, November 3, 2026, before the following members of the Ohio Board of Pharmacy (Board): Jason George, RPh, *Presiding*; T.J. Grimm, RPh, *Vice President*; Anthony Buchta, Sr., RPh; Trina Buettner, RPh; Denise Conway, RPh; Jeff Huston, RPh; Thomas Whiston, RPh; and Leonard Hubert, *Public Member*.

CasaPharmaRx was represented by Robbie Wright and Matthew Ludowig via written brief. The State of Ohio was represented by Matthew Meyer, Assistant Attorney General.

SUMMARY OF EVIDENCE

State's Witnesses:

1. Paul Schad, RPh

Respondent's Witnesses:

1. None

State's Exhibits:

1. November 17, 2025 Summary Suspension and Notice Letter
2. November 17, 2025 Receipt, Notice of Opportunity for Hearing
3. December 11, 2025 Request for Hearing
4. February 9, 2026 Waiver of 120-day rule

4a. CasaPharma RX, LLC Dispensing Records

5. February 12, 2026 Continuance Notice

5a. Continuance to June 1, 2026

6. May 20, 2026 Continuance Notice

6a. Continuance to August 3, 2026

7. October 22, 2025 Low-T Center Terminal Distributor Inspection Report

8. Chain of Custody Property Receipt Low T Center Incident I2025-2099

9. Photograph of 10/21/25 CasaPharma RX Prescription for Patient AP

10. Photograph of 10/21/25 CasaPharma RX Prescription for Patient RA

11. Photograph of 10/17/25 CasaPharma RX Prescription for Patient JA

12. Photograph of 10/21/25 CasaPharma RX Prescription for Patient AP

13. Photograph of 10/21/25 CasaPharma RX Prescription for Patient RA

14. Photograph of 10/17/2026 CasaPharma RX Prescription for Patient JA

15. Photograph of Chain of Custody Document Low T Center

16. Photograph of Chain of Custody Document Low T Center

17. Photograph of Chain of Custody Document Low T Center

18. Property Impound Report Document Low T Center

19. October 20, 2025 Email from Paul Schad RPh to rhaque@gmail.com

20. October 27, 2025 Letter from Attorney Benjamin L. Hisey on behalf of Low T Center with attached documents responsive to requests for information

21. November 4, 2025 email from Khandoker R Haque to Paul Schad with attachments

21a. Attachment 1 to 11/4/25 Khandoker R Haque Email

21b. Attachment 2 to 11/4/25 Khandoker R Haque Email

21c. Attachment 3 to 11/4/25 Khandoker R Haque Email

21d. Attachment 4 to 11/4/25 Khandoker R Haque Email

21e. Attachment 5 to 11/4/25 Khandoker R Haque Email

21f. Attachment 6 to 11/4/25 Khandoker R Haque Email

21g. Attachment 7 to 11/4/25 Khandoker R Haque Email

21h. Attachment 8 to 11/4/25 Khandoker R Haque Email

21i. Attachment 9 to 11/4/25 Khandoker R Haque Email

21j. Attachment 10 to 11/4/25 Khandoker R Haque Email

21k. Attachment 11 to 11/4/25 Khandoker R Haque Email

21l. Attachment 12 to 11/4/25 Khandoker R Haque Email

21m. Attachment 13 to 11/4/25 Khandoker R Haque Email

21n. Attachment 14 to 11/4/25 Khandoker R Haque Email

22. September 3, 2025 Casapharma RX Prescriptions for patients VM and LF

23. October 22, 2025 Casapharma RX Prescriptions for patient SP

24. July 21, 2026 email regarding continued Shipped/Dispensed Drugs into State of Ohio while Under Suspension and Notice of Continuance

25. July 29, 2026 Amended Summary Suspension/Notice of Opportunity for Hearing

26. July 29, 2026 Service Email

27. November 6, 2025 Amended Summary Suspension / Notice of Opportunity For Hearing – Low T Center

28. November 18, 2025 Executed Settlement Agreement – Low T Center

29. November 25, 2025 Email from Mahmoud Haque "Formal Notice of Resignation of Pharmacist-In-Charge and Related Regulatory Concerns" regarding Khandoker R Haque

30. Audio Recording Phone Interview Khandoker Haque I-2025-2100 10-27-25

31. Audio Recording Phone Interview Khandoker Haque I-2025-2100 11-17-25

Respondent's Written Legal Arguments and Contentions:

Respondent's CasaPharmaRx's Hearing Brief and Written Evidentiary Submission

Casa Exhibits In Support of Hearing Brief

Declaration of Stan G. Louie, Pharm.D Declaration In Support of Respondent CasaPharmRx's Hearing Brief and Written Evidentiary Submission

Declaration of Jamie Carter In Support of Respondent CasaPharmaRx's Hearing Brief and Written Evidentiary Submission

Respondent's Exhibits: (The Board is including Respondent's Exhibits because the State waived its objection to the manner of the submission.)

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R-2. Transcript, November 17, 2025

R-3. Respondent Letter to Board, June 19, 2026

R-4. June 25, 2026 Email

R-5. Respondent Letter to Board, July 20, 2026

R-6. October 29, 2026 Email

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R-8. FARMAKEIO dba FarmaKeio Settlement Agreement, Notice of Opportunity for Hearing, and Attachement

R-9. Brooksville Pharmaceuticals Settlement Agreement and Notice of Opportunity for Hearing.

A. Stan G. Louie, Pharm D. – Curriculum Vitae

B. Inspection reports, standard operating procedures, certificates of analysis, analytical testing, prescriptions, and other material

FINDINGS OF FACT

After hearing the testimony, observing the demeanor of the witnesses, considering the evidence, and weighing the credibility of each, the Board finds the following to be fact:

1. From on or about October 6, 2025, to on or about October 21, 2025, CasaPharmaRx dispensed into Ohio compounded prescriptions for non-FDA approved drugs and/or drugs that lack USP/NF monograph, are not a drug substance that are a component of an approved drug, and do not appear on the 503(A) bulk drug substances list (Category 1). CasaPharmaRx did not have an Ohio licensed responsible person at that time. The following prescriptions were dispensed to the Low T Center, located at 6275 Emerald Pkwy., Dublin, Ohio:

    a. BPC-157, 3mg/ml, 5ml, Rx#91245389, written on or about October 6, 2025, dispensed on or about October 8, 2025, for Patient #1.

    b. BPC-157, 3mg/ml, 5ml, written on or about October 9, 2025, for Patient #2.

    c. BPC-157, 3mg/ml, 5ml, Rx#91260315, written on or about October 13, 2025, dispensed on or about October 17, 2025, for Patient #3.

    d. BPC-157, 3mg/ml, 5ml, written on or about October 15, 2025, for Patient #4.

    e. BPC-157, 3mg/ml, 5ml, Rx#91267592, written on or about October 15, 2025, dispensed on or about October 17, 2025, for Patient #5.

    f. CJC-1295/Ipamorelin, 1.5mg/2.5mg/ml, 6ml, Rx#91280417, written on or about October 20, 2025, found at Low T Center, Dublin on October 22, 2025, for Patient #6.

    g. CJC-1295/Ipamorelin, 1.5mg/2.5mg/ml, 6ml, Rx#91280454, written on or about October 20, 2025, found at Low T Center, Dublin on October 22, 2025, for Patient #7.

2. On or about October 23, 2025, a Board Specialist sent a records request for a list of all prescriptions shipped into Ohio from October 23, 2022, to October 23, 2025, to CasaPharmaRx. On or about November 4, 2025, the Board received records of prescriptions shipped into Ohio from CasaPharmaRx. The records included two (2) prescriptions. The records were incomplete. A Board Specialist called CasaPharmaRx on November 5, 2025, and notified them that the response was incomplete. CasaPharmaRx stated they would conduct another search and provide additional records by the end of the day. Additional records were received on February 9, 2026.

3. CasaPharmaRx is a non-resident pharmacy engaged in drug compounding and shipping into Ohio. CasaPharmaRx did not have an Ohio-licensed pharmacist as its Responsible Person from on or about August 1, 2025, to on or about November 17, 2025.

CONCLUSIONS OF LAW

1. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of section 3715.52 of the ORC, prohibited acts, the following acts and causing them are prohibited:

    a. The manufacture, sale, or delivery, holding or offering for sale of any food, drug, device, or cosmetic that is adulterated[1] or misbranded[2], ORC Section 3715.52(A)(1); and

    b. The adulteration or misbranding of any food, drug, device, or cosmetic, ORC Section 3715.52(A)(2); and

    c. The sale, delivery for sale, holding for sale, or offering for sale of any article in violation of section 3715.61 or 3715.65 of the Revised Code, ORC Section 3715.52(A)(4).

2. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Section 3715.65(A) of the ORC, effective April 15, 2005, No person shall sell, deliver, offer for sale, hold for sale, or give away any new drug unless an application with respect to the drug has become effective under section 505 of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, as amended.

3. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.57(B) of the ORC, as effective April 4, 2023:

    a. Violating any rule of the board, ORC Section 4729.57(B)(2); and

    b. Violating any provision of this chapter, ORC Section 4729.57(B)(3); and

    c. Except as provided in section 4729.89 of the Revised Code, violating any provision of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, or Chapter 3715. of the Revised Code, ORC Section 4729.57(B)(4); and

    d. Any other cause for which the board may impose discipline as set forth in rules adopted under section 4729.26 of the Revised Code, ORC Section 4729.57(B)(10).

4. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-8-03 of the OAC, Compliance, as effective February 1, 2022:

    a. A nonresident terminal distributor of dangerous drug shall comply with all the statutory requirements of the state of Ohio set forth in Chapters 4729., 3719., 3715., and 2925. of the Revised Code for all drugs sold, dispensed or personally furnished into this state, unless the licensee can demonstrate that such compliance would cause the nonresident terminal distributor of dangerous drugs to violate either the statutory or regulatory requirements of the state in which it is located or federal statutory or regulatory requirements, OAC Rule 4729:5-8-03(E); and

[1] ORC Section 3715.63: When a drug or device is adulterated

[2] ORC Section 3715.64: Misbranded drug or device

b. A nonresident terminal distributor of dangerous drugs shall operate in compliance with all applicable laws, regulations and standards set forth by the United States food and drug administration and the United States drug enforcement administration, OAC Rule 4729:5-8-03(H); and

c. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy to carry out its responsibilities as a licensing, regulatory, and drug law enforcement agency of the state of Ohio, OAC Rule 4729:5-8-03(J); and

d. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy and any local, state, or federal agency to carry out its responsibilities in enforcing the federal and state laws governing the distribution of drugs in the state of Ohio, OAC Rule 4729:5-8-03(K).

5. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Rule 4729:5-8-04(G)(1) of the OAC, Drugs compounded by a nonresident pharmacy, a pharmacy licensed as a non-resident pharmacy that is engaged in drug compounding shall have an Ohio licensed pharmacist as the responsible person on its license, as effective February 1, 2022.

6. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, Responsible Person of a Terminal Distributor, as effective March 1, 2019, and April 25, 2022:

   a. The responsible person shall be responsible for the practice of the profession of pharmacy, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(A)(2); and

   b. The person to whom the terminal distributor of dangerous drugs license has been issued and all pharmacists on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of drugs and the practice of pharmacy, OAC Rule 4729:5-2-01(A)(3).

   c. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC 4729:5-2-01(E)(4); and

   d. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC 4729:5-2-01(E)(6).

7. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-4-01 of the OAC, as effective April 25, 2022:

   a. Violating any rule of the board, OAC Rule 4729:5-4-01(B)(2); and

   b. Violating any provision of Chapter 4729. of the Revised Code, OAC Rule 4729:5-4-01(B)(3); and

   c. Except as provided in section 4729.89 of the Revised Code, violating any provision of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, or Chapter 3715. of the Revised Code, OAC Rule 4729:5-4-01(B)(4); and

   d. Falsely or fraudulently promoting to the public a dangerous drug, except that nothing in this rule prohibits a terminal distributor of dangerous drugs from furnishing information concerning a dangerous drug to a health care provider or another licensed terminal distributor, OAC Rule 4729:5-4-01(B)(6); and

   e. Commission of an act that constitutes a misdemeanor that is related to, or committed in, the person's professional practice, OAC Rule 4729:5-4-01(B)(18); and

   f. The method used by the terminal distributor to store, possess or distribute dangerous drugs poses serious harm to others, OAC Rule 4729:5-4-01(B)(23).

DECISION OF THE BOARD

Pursuant to Section 4757.571(A)(1) of the Ohio Revised Code, the Ohio Board of Pharmacy hereby lifts the Summary Suspension Order issued to CasaPharmaRx on November 17, 2025.

Pursuant to Section 4729.57 of the Ohio Revised Code and Ohio Administrative Code Rule 4729:5-1-01(U), and after consideration of the record as a whole, the Ohio Board of Pharmacy adjudicates the matter of CasaPharmaRx as follows:

On the basis of the Findings of Fact and Section (1) through (7) of the Conclusions of Law, taken collectively or as individual violations, the Ohio Board of Pharmacy hereby revokes permanently the Terminal Distributor of Dangerous Drugs (TDDD) license, No. 02-40000438, held by CasaPharmaRx, effective the date of this Order.

Pursuant to 4729.57 of the Ohio Revised Code, the State of Ohio Board of Pharmacy imposes a monetary penalty in the amount of $350,000.00. This fine will be attached to the license record for CasaPharmaRx and must be paid no later than 180 days from the effective date of this Order. To pay this fine a representative of CasaPharmaRx must log in to www.elicense.ohio.gov and process the items in the cart.

Further, The Board finds the following:

1. The Board specifically finds that BPC-157 and CJC-1295/Ipamorelin are adulterated and/or misbranded drugs as defined in ORC 3715.63 and 3715.64.

2. The Board finds that Respondent purposely failed to provide records to the Board, knowing that the records would demonstrate violation of the summary suspension imposed on November 17, 2025, which prohibited Respondent from continuing to ship prescription drugs into Ohio. Respondent was notified of the suspension both verbally (see Exhibit 31 in Case No. A-2025-0363) and in writing through the Summary Suspension/Notice of Opportunity for Hearing (see Exhibit 1 in Case No. A-2025-0363). Although Respondent asserts in its Evidentiary Submission that this was an unintentional error, the Board finds this error to be serious and in willful disregard for the Board's summary suspension.

3. The Board finds that there is no current evidence of known patient harm, but such harm is not required when making the determination to summarily suspend a terminal distributor of dangerous drugs (TDDD) or to impose discipline. Rather, in deciding to summarily suspend a TDDD, the Board need only determine that there is a *danger of immediate and serious harm*. To require actual harm before acting to protect the citizens of Ohio is absurd. The Board expressly finds that the distribution of adulterated and/or misbranded drugs that are not approved for compounding is clear and convincing evidence of a danger of immediate and serious harm to others due to the method used by the terminal distributor to possess or distribute dangerous drugs and warranted suspension of Respondent's license. Further, Respondent's continued failure to comply with Ohio rules, including refusing to provide requested records for months and repeated disregard for the terms of its summary suspension by continuing to distribute drugs into Ohio, warrants license revocation.

4. Even though Respondent failed to appear in person or through counsel, the Board considered the written arguments and evidence submitted by Respondent and gave it proper weight. The Board notes that, even in its own filings, Respondent admitted to many of the allegations contained in the Notices.

Further, the Board hereby grants the State's Motion to Seal the Record in this matter including, but not limited to, all confidential patient health information contained in the record, specifically State's exhibits 4, 4a, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 22, 23, and 24.

T.J. Grimm moved for Findings of Fact; Jeff Huston seconded the motion. Motion passed (Yes-7/No-0).

T.J. Grimm moved for Conclusions of Law; Jeff Huston seconded the motion. Motion passed (Yes-7/No-0).

T.J. Grimm moved for Action of the Board; Jeff Huston seconded the motion. Motion passed (Yes-7/No-0).

SO ORDERED.

It is hereby certified by this Board that the above language is a copy of the Order entered upon its journal in this case.

TIME AND METHOD TO PERFECT AN APPEAL

Any party desiring to appeal shall file a Notice of Appeal with the Ohio Board of Pharmacy, 77 South High Street, 17th Floor, Columbus, OH 43215, setting forth the order appealed from and stating that the agency's order is not supported by reliable, probative, and substantial evidence and is not in accordance with law. The notice of appeal may, but need not, set forth the specific grounds of the party's appeal beyond the statement that the agency's order is not supported by reliable, probative, and substantial evidence and is not in accordance with law. The Notice of Appeal shall also be filed by the appellant in the court of common pleas of the county in which the place of business of the licensee is located or the county in which the licensee is a resident. If the appellant is not a resident of and has no place of business in this state, the party may appeal to the court of common pleas of Franklin county. Such notices of appeal shall be filed within fifteen (15) days after the service of the notice of the Ohio Board of Pharmacy's Order as provided in Section 119.12 of the Ohio Revised Code.

BY ORDER OF THE STATE BOARD OF PHARMACY

ORDER MAILED & EFFECTIVE: **November 6, 2026**

By: Steven W. Schierholt

Steven W. Schierholt, Esq., Executive Director

SWS/jak/jrn

NOTICE

Documents beyond this page may not meet the ADA WCAG 2.0 AA standard due to their creation date.

If you need an accessible version of the following documents, please email legal@pharmacy.ohio.gov.

AMENDED SUMMARY SUSPENSION/NOTICE OF OPPORTUNITY FOR HEARING
TERMINAL DISTRIBUTOR OF DANGEROUS DRUGS LICENSE

IN THE MATTER OF:

CasaPharmaRx
12855 Capricorn Street
Stafford, TX 77477

CASE NO. A-2025-0363

License No. 02-40000438

-THIS IS A RED INK STAMP-
I certify this to be a true and exact copy of the original document on file with the Ohio State Board of Pharmacy.
Steven W. Schierholt, Esq., Executive Dir.
Date: 7/29/2026
-MUST HAVE BOARD SEAL TO BE OFFICIAL-

July 29, 2026

Dear CasaPharmaRx:

You are notified, in accordance with Section 119.07 of the Revised Code, the State of Ohio Board of Pharmacy (Board) hereby SUMMARILY SUSPENDS CasaPharmaRx's (CasaPharmaRx) license as a Terminal Distributor of Dangerous Drugs (TDDD), under authority of Sections 4729.57 and 4729.571 of the Ohio Revised Code.

Furthermore, the Board finds that based upon the facts set forth in the Allegations Section, there is clear and convincing evidence of a danger of immediate and serious harm to others due to CasaPharmaRx's method used to possess or distribute dangerous drugs. As such, the Board summarily suspends CasaPharmaRx's license as a Terminal Distributor of Dangerous Drugs.

JURISDICTION

1. Pursuant to Section 4729.57 of the Ohio Revised Code (ORC) and the rules adopted thereunder, the Board has the authority to suspend, revoke, restrict, limit, or refuse to grant or renew any license issued pursuant to Sections 4729.54 and 4729.55 of the ORC to practice as a TDDD in the state of Ohio. Additionally, Section 4729.57 of the Revised Code grants the Board the authority to impose a monetary penalty or forfeiture not to exceed in severity any fine designated under the Revised Code for a similar offense or $1,000 if the acts committed have not been classified as an offense by the ORC.

2. Pursuant to Section 4729.571(A)(1) of the ORC and the rules adopted thereunder, the Board has the authority to suspend a terminal distributor's license without a hearing if it determines that there is clear and convincing evidence of a danger of immediate and serious harm to others due to the method used by the terminal distributor to possess or distribute dangerous drugs.

3. CasaPharmaRx, located at 12855 Capricorn St., Stafford, TX, a 503A Pharmacy, is a licensed TDDD under license number 02-40000438. CasePharmaRx does not have an Ohio-licensed Responsible Person.

ALLEGATIONS

1. From on or about October 6, 2025, to on or about October 21, 2025, CasaPharmaRx dispensed into Ohio compounded prescriptions for non-FDA approved drugs and/or drugs that lack USP/NF monograph, are not a drug substance that are a component of an approved drug, and do not appear on the 503(A) bulk drug substances list (Category 1). CasaPharmaRx did not have an Ohio licensed responsible person at that time. The following prescriptions were dispensed to the Low T Center, located at 6275 Emerald Pkwy., Dublin, Ohio:

    a. BPC-157, 3mg/ml, 5ml, Rx#91245389, written on or about October 6, 2025, dispensed on or about October 8, 2025, for Patient #1.

    b. BPC-157, 3mg/ml, 5ml, written on or about October 9, 2025, for Patient #2.

    c. BPC-157, 3mg/ml, 5ml, Rx#91260315, written on or about October 13, 2025, dispensed on or about October 17, 2025, for Patient #3.

    d. BPC-157, 3mg/ml, 5ml, written on or about October 15, 2025, for Patient #4.

    e. BPC-157, 3mg/ml, 5ml, Rx#91267592, written on or about October 15, 2025, dispensed on or about October 17, 2025, for Patient #5.

    f. CJC-1295/Ipamorelin, 1.5mg/2.5mg/ml, 6ml, Rx#91280417, written on or about October 20, 2025, found at Low T Center, Dublin on October 22, 2025, for Patient #6.

    g. CJC-1295/Ipamorelin, 1.5mg/2.5mg/ml, 6ml, Rx#91280454, written on or about October 20, 2025, found at Low T Center, Dublin on October 22, 2025, for Patient #7.

2. On or about October 23, 2025, a Board Specialist sent a records request for a list of all prescriptions shipped into Ohio from October 23, 2022, to October 23, 2025, to CasaPharmaRx. On or about November 4, 2025, the Board received records of prescriptions shipped into Ohio from CasaPharmaRx. The records included two (2) prescriptions. The records were incomplete. A Board Specialist called CasaPharmaRx on November 5, 2025, and notified them that the response was incomplete. CasaPharmaRx stated they would conduct another search and provide additional records by the end of the day. Additional records were received on February 9, 2026.

3. CasaPharmaRx is a non-resident pharmacy engaged in drug compounding and shipping into Ohio. CasaPharmaRx did not have an Ohio-licensed pharmacist as its Responsible Person from on or about August 1, 2025, to on or about November 17, 2025.

POTENTIAL VIOLATIONS OF LAW

1. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of section 3715.52 of the ORC, prohibited acts, each, a misdemeanor of the fourth degree, each punishable by a maximum penalty of $2,000 if committed by an organization: The following acts and causing them are prohibited:

    a. The manufacture, sale, or delivery, holding or offering for sale of any food, drug, device, or cosmetic that is adulterated[1] or misbranded[2], ORC Section 3715.52(A)(1); and/or

    b. The adulteration or misbranding of any food, drug, device, or cosmetic, ORC Section 3715.52(A)(2); and/or

    c. The sale, delivery for sale, holding for sale, or offering for sale of any article in violation of section 3715.61 or 3715.65 of the Revised Code, ORC Section 3715.52(A)(4).

2. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Section 3715.65(A) of the ORC, effective April 15, 2005, No person shall sell, deliver, offer for sale, hold for sale, or give away any new drug unless an application with respect to the drug has become effective under section 505 of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, as amended, each violation is a misdemeanor of the fourth degree, each violation punishable by a maximum penalty of $2,000 if committed by an organization.

3. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Section 2925.09(A) of the ORC, effective March 22, 2019, no person shall administer, dispense, distribute, manufacture, possess, sell, or use any drug, other than a controlled substance, that is not approved by the United States food and drug administration, or the United States department of agriculture, each violation is a felony of the fifth degree, each violation punishable by a maximum penalty of $7,500 if committed by an organization.

4. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, as effective March 1, 2019, and April 25, 2022, each violation punishable by a maximum penalty of $1,000:

    a. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC Rule 4729:5-2-01(E)(4); and/or

    b. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and

[1] ORC Section 3715.63: When a drug or device is adulterated

[2] ORC Section 3715.64: Misbranded drug or device

control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(E)(6).

5. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.57(B) of the ORC, as effective April 4, 2023, each violation punishable by a maximum penalty of $1,000:

    a. Violating any rule of the board, ORC Section 4729.57(B)(2); and/or

    b. Violating any provision of this chapter, ORC Section 4729.57(B)(3); and/or

    c. Except as provided in section 4729.89 of the Revised Code, violating any provision of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, or Chapter 3715. of the Revised Code, ORC Section 4729.57(B)(4); and/or

    d. Any other cause for which the board may impose discipline as set forth in rules adopted under section 4729.26 of the Revised Code, ORC Section 4729.57(B)(10).

6. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-8-03 of the OAC, Compliance, as effective February 1, 2022, each violation punishable by a maximum penalty of $1,000:

    a. A nonresident terminal distributor of dangerous drug shall comply with all the statutory requirements of the state of Ohio set forth in Chapters 4729., 3719., 3715., and 2925. of the Revised Code for all drugs sold, dispensed or personally furnished into this state, unless the licensee can demonstrate that such compliance would cause the nonresident terminal distributor of dangerous drugs to violate either the statutory or regulatory requirements of the state in which it is located or federal statutory or regulatory requirements, OAC Rule 4729:5-8-03(E); and/or

    b. A nonresident terminal distributor of dangerous drugs shall operate in compliance with all applicable laws, regulations and standards set forth by the United States food and drug administration and the United States drug enforcement administration, OAC Rule 4729:5-8-03(H); and/or

    c. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy to carry out its responsibilities as a licensing, regulatory, and drug law enforcement agency of the state of Ohio, OAC Rule 4729:5-8-03(J); and/or

    d. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy and any local, state, or federal agency to carry out its responsibilities in enforcing the federal and state laws governing the distribution of drugs in the state of Ohio, OAC Rule 4729:5-8-03(K).

7. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Rule 4729:5-8-04(G)(1) of the OAC, Drugs compounded by a nonresident pharmacy, a pharmacy licensed as a non-resident pharmacy that is engaged in drug compounding shall have an Ohio licensed pharmacist as the responsible person on its license, as effective February 1, 2022, each violation punishable by a maximum penalty of $1,000:

8. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, Responsible Person of a Terminal Distributor, as effective March 1, 2019, and April 25, 2022, each violation punishable by a maximum penalty of $1,000:

    a. The responsible person shall be responsible for the practice of the profession of pharmacy, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(A)(2); and/or

    b. The person to whom the terminal distributor of dangerous drugs license has been issued and all pharmacists on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of drugs and the practice of pharmacy, OAC Rule 4729:5-2-01(A)(3).

    c. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC 4729:5-2-01(E)(4); and/or

    d. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC 4729:5-2-01(E)(6).

9. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-4-01 of the OAC, as effective April 25, 2022, each violation punishable by a maximum penalty of $1,000:

    a. Violating any rule of the board, OAC Rule 4729:5-4-01(B)(2); and/or

    b. Violating any provision of Chapter 4729. of the Revised Code, OAC Rule 4729:5-4-01(B)(3); and/or

    c. Except as provided in section 4729.89 of the Revised Code, violating any provision of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, or Chapter 3715. of the Revised Code, OAC Rule 4729:5-4-01(B)(4); and/or

d. Falsely or fraudulently promoting to the public a dangerous drug, except that nothing in this rule prohibits a terminal distributor of dangerous drugs from furnishing information concerning a dangerous drug to a health care provider or another licensed terminal distributor, OAC Rule 4729:5-4-01(B)(6); and/or

e. Commission of an act that constitutes a misdemeanor that is related to, or committed in, the person's professional practice, OAC Rule 4729:5-4-01(B)(18); and/or

f. The method used by the terminal distributor to store, possess or distribute dangerous drugs poses serious harm to others, OAC Rule 4729:5-4-01(B)(23).

YOU ARE FURTHER NOTIFIED, in accordance with the provisions of Chapters 119. and 4729. of the Ohio Revised Code, that you are entitled to a hearing before the Ohio Board of Pharmacy.

The Board is in receipt of your request for a hearing dated December 11, 2025; no additional request for a hearing is necessary. Per a new scheduling notice, your hearing is scheduled for Tuesday, November 3, 2026, and Wednesday, November 4, 2026.

If you have questions regarding the Chapter 119. Administrative Hearing process, please e-mail your questions to legal@pharmacy.ohio.gov or call the Board office at 614-466-4143 and ask for the legal department.

BY ORDER OF THE OHIO BOARD OF PHARMACY

Steven W. Schierholt, Esq., Executive Director

SWS/jak/jrn

-THIS IS A RED INK STAMP-
I certify this to be a true and exact copy of the original document on file with the Ohio State Board of Pharmacy.
Steven W. Schierholt, Esq., Executive Dir.
Date: 11/17/2025
-MUST HAVE BOARD SEAL TO BE OFFICIAL-

SUMMARY SUSPENSION/NOTICE OF OPPORTUNITY FOR HEARING
TERMINAL DISTRIBUTOR OF DANGEROUS DRUGS LICENSE

IN THE MATTER OF: **CASE NO. A-2025-0363**

CasaPharmaRx **License No. 02-40000438**
c/o Khandoker Haque, RPh
12855 Capricorn Street
Stafford, TX 77477

November 17, 2025

Dear CasaPharmaRx and Khandoker Haque, RPh:

You are notified, in accordance with Section 119.07 of the Revised Code, the State of Ohio Board of Pharmacy (Board) hereby SUMMARILY SUSPENDS CasaPharmaRx's (CasaPharmaRx) license as a Terminal Distributor of Dangerous Drugs (TDDD), under authority of Sections 4729.57 and 4729.571 of the Ohio Revised Code.

Furthermore, the Board finds that based upon the facts set forth in the Allegations Section, there is clear and convincing evidence of a danger of immediate and serious harm to others due to CasaPharmaRx's method used to possess or distribute dangerous drugs. As such, the Board summarily suspends CasaPharmaRx's license as a Terminal Distributor of Dangerous Drugs.

JURISDICTION

1. Pursuant to Section 4729.57 of the Ohio Revised Code (ORC) and the rules adopted thereunder, the Board has the authority to suspend, revoke, restrict, limit, or refuse to grant or renew any license issued pursuant to Sections 4729.54 and 4729.55 of the ORC to practice as a TDDD in the state of Ohio. Additionally, Section 4729.57 of the Revised Code grants the Board the authority to impose a monetary penalty or forfeiture not to exceed in severity any fine designated under the Revised Code for a similar offense or $1,000 if the acts committed have not been classified as an offense by the ORC.

2. Pursuant to Section 4729.571(A)(1) of the ORC and the rules adopted thereunder, the Board has the authority to suspend a terminal distributor's license without a hearing if it determines that there is clear and convincing evidence of a danger of immediate and serious harm to others due to the method used by the terminal distributor to possess or distribute dangerous drugs.

3. CasaPharmaRx, located at 12855 Capricorn St., Stafford, TX, a 503A Pharmacy, is a licensed TDDD under license number 02-40000438. CasePharmaRx does not have an Ohio-licensed Responsible Person. Khandoker Haque, RPh is a Texas-licensed pharmacist and is the Pharmacist in Charge for CasaPharmaRx.

ALLEGATIONS

1. From on or about October 6, 2025, to on or about October 20, 2025, CasaPharmaRx dispensed into Ohio compounded prescriptions for non-FDA approved drugs and/or drugs that lack USP/NF monograph, are not a drug substance that are a component of an approved drug, and do not appear on the 503(A) bulk drug substances list (Category 1). CasaPharmaRx did not have an Ohio licensed responsible person at that time. The following prescriptions were dispensed into Ohio:

    a. BPC-157, 3mg/ml, 5ml, October 6, 2025.

    b. BPC-157, 3mg/ml, 5ml, October 9, 2025.

    c. BPC-157, 3mg/ml, 5ml, October 10, 2025.

    d. BPC-157, 3mg/ml, 5ml, October 15, 2025.

    e. BPC-157, 3mg/ml, 5ml, October 15, 2025.

    f. CJC-1295/Ipamorelin, 1.5mg/2.5mg/ml, 6ml, October 20, 2025.

    g. CJC-1295/Ipamorelin, 1.5mg/2.5mg/ml, 6ml, October 20, 2025.

2. On or about October 23, 2025, a Board Specialist sent a records request for a list of all prescriptions shipped into Ohio from October 23, 2022, to October 23, 2025, to CasaPharmaRx. On or about November 4, 2025, the Board received records of prescriptions shipped into Ohio from CasaPharmaRx. The records included two (2) prescriptions. The records were incomplete. A Board Specialist called CasaPharmaRx on November 5, 2025, and notified them that the response was incomplete. CasaPharmaRx stated they would conduct another search and provide additional records by the end of the day. Additional records have not been received.

3. CasaPharmaRx is a non-resident pharmacy engaged in drug compounding and shipping into Ohio. CasaPharmaRx did not have an Ohio-licensed pharmacist as its Responsible Person from on or about August 1, 2025, to on or about November 17, 2025.

POTENTIAL VIOLATIONS OF LAW

1. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of section 3715.52 of the ORC, prohibited acts, each, a misdemeanor of the fourth degree, each punishable by a maximum penalty of $2,000 if committed by an organization: The following acts and causing them are prohibited:

a. The manufacture, sale, or delivery, holding or offering for sale of any food, drug, device, or cosmetic that is adulterated[1] or misbranded[2], ORC Section 3715.52(A)(1); and/or

b. The adulteration or misbranding of any food, drug, device, or cosmetic, ORC Section 3715.52(A)(2); and/or

c. The sale, delivery for sale, holding for sale, or offering for sale of any article in violation of section 3715.61 or 3715.65 of the Revised Code, ORC Section 3715.52(A)(4).

2. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Section 3715.65(A) of the ORC, effective April 15, 2005, No person shall sell, deliver, offer for sale, hold for sale, or give away any new drug unless an application with respect to the drug has become effective under section 505 of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, as amended, each violation is a misdemeanor of the fourth degree, each violation punishable by a maximum penalty of $2,000 if committed by an organization.

3. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Section 2925.09(A) of the ORC, effective March 22, 2019, no person shall administer, dispense, distribute, manufacture, possess, sell, or use any drug, other than a controlled substance, that is not approved by the United States food and drug administration, or the United States department of agriculture, each violation is a felony of the fifth degree, each violation punishable by a maximum penalty of $7,500 if committed by an organization.

4. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, as effective March 1, 2019, and April 25, 2022, each violation punishable by a maximum penalty of $1,000:

   a. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC Rule 4729:5-2-01(E)(4); and/or

   b. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(E)(6).

5. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of each of the following divisions of Section 4729.57(B) of the ORC, as effective April 4, 2023, each violation punishable by a maximum penalty of $1,000:

   a. Violating any rule of the board, ORC Section 4729.57(B)(2); and/or

[1] ORC Section 3715.63: When a drug or device is adulterated

[2] ORC Section 3715.64: Misbranded drug or device

b. Violating any provision of this chapter, ORC Section 4729.57(B)(3); and/or

c. Except as provided in section 4729.89 of the Revised Code, violating any provision of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, or Chapter 3715. of the Revised Code, ORC Section 4729.57(B)(4); and/or

d. Any other cause for which the board may impose discipline as set forth in rules adopted under section 4729.26 of the Revised Code, ORC Section 4729.57(B)(10).

6. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-8-03 of the OAC, Compliance, as effective February 1, 2022, each violation punishable by a maximum penalty of $1,000:

   a. A nonresident terminal distributor of dangerous drug shall comply with all the statutory requirements of the state of Ohio set forth in Chapters 4729., 3719., 3715., and 2925. of the Revised Code for all drugs sold, dispensed or personally furnished into this state, unless the licensee can demonstrate that such compliance would cause the nonresident terminal distributor of dangerous drugs to violate either the statutory or regulatory requirements of the state in which it is located or federal statutory or regulatory requirements, OAC Rule 4729:5-8-03(E); and/or

   b. A nonresident terminal distributor of dangerous drugs shall operate in compliance with all applicable laws, regulations and standards set forth by the United States food and drug administration and the United States drug enforcement administration, OAC Rule 4729:5-8-03(H); and/or

   c. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy to carry out its responsibilities as a licensing, regulatory, and drug law enforcement agency of the state of Ohio, OAC Rule 4729:5-8-03(J); and/or

   d. A nonresident terminal distributor of dangerous drugs shall supply, within three business days of a request, all information needed by the board of pharmacy and any local, state, or federal agency to carry out its responsibilities in enforcing the federal and state laws governing the distribution of drugs in the state of Ohio, OAC Rule 4729:5-8-03(K).

7. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of Rule 4729:5-8-04(G)(1) of the OAC, Drugs compounded by a nonresident pharmacy, a pharmacy licensed as a non-resident pharmacy that is engaged in drug compounding shall have an Ohio licensed pharmacist as the responsible person on its license, as effective February 1, 2022, each violation punishable by a maximum penalty of $1,000:

8. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, Responsible Person of a Terminal Distributor, as effective March 1, 2019, and April 25, 2022, each violation punishable by a maximum penalty of $1,000:

a. The responsible person shall be responsible for the practice of the profession of pharmacy, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC Rule 4729:5-2-01(A)(2); and/or

b. The person to whom the terminal distributor of dangerous drugs license has been issued and all pharmacists on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of drugs and the practice of pharmacy, OAC Rule 4729:5-2-01(A)(3).

c. The responsible person to whom the terminal distributor of dangerous drugs license has been issued and all licensed health professionals on duty are responsible for compliance with all state and federal laws, regulations, and rules governing the distribution of dangerous drugs, OAC 4729:5-2-01(E)(4); and/or

d. The responsible person shall be responsible for ensuring the terminal distributor of dangerous drugs requirements are met, including, but not limited to, the supervision and control of dangerous drugs as required in division (B) of section 4729.55 of the Revised Code, adequate safeguards as required in division (C) of section 4729.55 of the Revised Code, security and control of dangerous drugs and maintaining all drug records otherwise required, OAC 4729:5-2-01(E)(6).

9. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-4-01 of the OAC, as effective April 25, 2022, each violation punishable by a maximum penalty of $1,000:

a. Violating any rule of the board, OAC Rule 4729:5-4-01(B)(2); and/or

b. Violating any provision of Chapter 4729. of the Revised Code, OAC Rule 4729:5-4-01(B)(3); and/or

c. Except as provided in section 4729.89 of the Revised Code, violating any provision of the "Federal Food, Drug, and Cosmetic Act," 52 Stat. 1040 (1938), 21 U.S.C.A. 301, or Chapter 3715. of the Revised Code, OAC Rule 4729:5-4-01(B)(4); and/or

d. Falsely or fraudulently promoting to the public a dangerous drug, except that nothing in this rule prohibits a terminal distributor of dangerous drugs from furnishing information concerning a dangerous drug to a health care provider or another licensed terminal distributor, OAC Rule 4729:5-4-01(B)(6); and/or

e. Commission of an act that constitutes a misdemeanor that is related to, or committed in, the person's professional practice, OAC Rule 4729:5-4-01(B)(18); and/or

f. The method used by the terminal distributor to store, possess or distribute dangerous drugs poses serious harm to others, OAC Rule 4729:5-4-01(B)(23).

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

IF YOU DESIRE A HEARING, such request shall either be mailed to the Ohio Board of Pharmacy, Attn: Legal, 77 South High Street, 17th Floor, Columbus, Ohio 43215-6126 or an e-mail request may be sent to legal@pharmacy.ohio.gov (**please note faxes will not be accepted**). **YOUR REQUEST MUST BE RECEIVED ON OR PRIOR TO THE 30TH DAY FOLLOWING THE SERVICE DATE OF THIS NOTICE.** Please note that if you submit a request via email, your request will be acknowledged within one business day of receipt. If you do not receive an acknowledgment, please contact the Board offices at 614-466-4143 and request the legal department. 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. **If you are a business entity, including but not limited to a corporation, limited liability company, or a limited partnership, you must be represented at the hearing by an attorney licensed to practice in the state of Ohio.**

YOU ARE FURTHER ADVISED that if there is no request for such a hearing received by the Board on or prior to the 30th day following the service of this notice, the Ohio Board of Pharmacy, upon consideration of the aforementioned allegations against you, may take action without such a hearing, and may adopt a final order that contains the board's findings. In the final order, the board may impose any of the sanctions listed in division RC 4729.57(A).

If you have questions regarding the Chapter 119. Administrative Hearing process, please e-mail your questions to legal@pharmacy.ohio.gov or call the Board office at 614-466-4143 and ask for the legal department.

BY ORDER OF THE OHIO BOARD OF PHARMACY

Steven W. Schierholt, Esq., Executive Director

SWS/jak/jrn