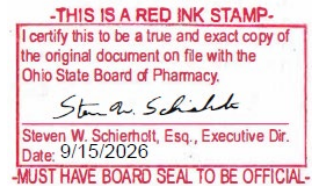




**SUMMARY SUSPENSION/NOTICE OF OPPORTUNITY FOR HEARING
TERMINAL DISTRIBUTOR OF DANGEROUS DRUGS LICENSE**



IN THE MATTER OF:

CASE NOS. A-2026-0325

Revitalize Medical Group dba Forum Health Akron

License No. 02-62001014

3634 W. Market Street, Suite 104
Fairlawn, Ohio 44333

September 15, 2026

Dear Revitalize Medical Group dba Forum Health Akron:

You are notified, in accordance with Section 119.07 of the Revised Code, the Ohio Board of Pharmacy (Board) hereby SUMMARILY SUSPENDS Revitalize Medical Group dba Forum Health Akron's 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 Revitalize Medical Group dba Forum Health Akron's method used to possess or distribute dangerous drugs, and the method of prescribing dangerous drugs used by a licensed health professional authorized to prescribe drugs who holds a terminal distributor license or practices in the employ of or under contract with a terminal distributor. As such, the Board summarily suspends Revitalize Medical Group dba Forum Health Akron'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. Further, pursuant to Section 4729.55(E), the Board shall refuse to issue a future license to an applicant for a TDDD if the applicant, or any agent (including any owner or responsible person) or employee of the applicant, has been found to have violated any of the specified laws identified therein or any rule of the board, absent proof of adequate safeguards assuring prevention of a recurrence of the violation. 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. Revitalize Medical Group dba Forum Health Akron, located at 3634 W. Market Street, Suite 104, Fairlawn, Ohio, is a licensed TDDD under license number 02-62001014 and lists Tara D. Scott, [Ohio Medical Board license number 35.071987] as the Responsible Person.

ALLEGATIONS

1. On or about September 9, 2026 a Board Inspector, Board Specialist and Agent of the Board (Board inspectors) conducted an inspection at Revitalize Medical Group dba Forum Health Akron (Revitalize Medical Group), located at 3634 W. Market Street, Suite 104, Fairlawn, Ohio.
2. During the inspection, Board inspectors observed drugs purchased from Alpha BioMed in a black safe. The drugs were labeled "professional use only" and/or "physician use only" and/or "not for resale". Alpha Biomed is an entity that is not a licensed wholesale drug distributor, outsourcing facility, compounding pharmacy, or drug manufacturer in the United States and does not have Food and Drug Administration (FDA) manufacturer registration. Dangerous Drugs purchased from Alpha BioMed are misbranded and adulterated.
 - a. In addition to not being purchased from a licensed entity, the vials contained unapproved dangerous drugs. The purported bulk substances/active pharmaceutical ingredients were ineligible for compounding because they lack a United States Pharmacopeia – National Formulary (USP/NF) monograph, are not drug substances that are components of approved drugs, and do not appear on the Food and Drug Administration (FDA) approved 503A bulk drug substances list (Category 1 list). Additionally, multiple vials contained powder that could be classified as Biological Product, which requires an approved Biologics License Application (BLA) to compound. Alpha BioMed does not have an active, approved BLA. The list of the 49 vials is set forth in Attachment A, attached hereto and incorporated as though fully set forth herein.
3. The inspection conducted on September 9, 2026, resulted in 12 warnings requiring written responses, including numerous compounding violations. The violations requiring a written response included, but was not limited to:
 - a. Purchases of dangerous drugs from an unlicensed entity.
 - i. Revitalize Medical Group purchased dangerous drugs from Alpha BioMed.
 - b. The clinic did not complete an annual query of the board's online roster prior to purchase of dangerous drugs at wholesale.

- c. Refrigerators used for storage of drugs and devices did not record temperatures daily.
 - i. The clinic monitors the temperature of the refrigerator by using a paper log; however, the log did not have an observation date recorded since February 2026. The clinic only documents temperature on days when the clinic is open; there was no continuous monitoring or temperature logs and no way for clinic staff to know if an excursion occurred during days the clinic was closed.
- d. Inventory records for controlled substances were not maintained.
 - i. The clinic must complete an annual controlled substance inventory, in accordance with 21 CFR 1304.11 and the OAC.
- e. The Responsible Person failed to oversee the requirements of immediate use, sterile non-hazardous prescriber compounding.
 - i. The compounding policies, records and compounding area/hood were not compliant with USP <797> sterile compounding.
- f. Immediate-use prescriber compounding cannot have more than 3 commercially available packages of sterile, non-hazardous drugs from the manufacturer's original containers and not more than 2 entries into any one container or package.
 - i. The clinic performed immediate use compounding on-site by adding more than 2 ingredients to an IV bag (more than 3 ingredients).
 - 1. The most common IV compound was Renewed Energy which contained 12 ingredients in addition to the IV bag.
- g. The clinic did not assign appropriate beyond use dates (BUD) for immediate use sterile compounding drugs.
 - i. A 6-hour BUD must be assigned for immediate use sterile compounding.
- h. The clinic personally furnished immediate-use compounded drugs.
 - i. Unapproved drugs were compounded and personally furnished to patients. Immediate-use compounded drugs must not be personally furnished.
- i. The clinic compounded medium and high-risk level preparations without compliance with USP <797>.
 - i. For example, the clinic reconstituted API such as BPC-157 and compounded IV bags containing more than 2 ingredients without use of a cleanroom or ISO 5 environment.

- j. Personnel who engaged in compounding did not have training documents available during the inspection.
 - k. The clinic failed to document the medication validation (“final check”) of the compounded drugs (no positive identification).
 - l. The clinic purchased unapproved drugs from Alpha BioMed. Patients were seen by a prescriber and prescribed the unapproved drugs. The unapproved drugs were compounded at the clinic and sent home with the patient for self-administration. Occasionally, patients would inject themselves on the first occasion at the clinic, in front of a prescriber.
4. During the inspection, Board inspectors learned the following:
- a. Revitalize Medical Group contracted with Forum Health for drug ordering and report management systems. Forum Health’s wholesale team would place orders with their wholesalers. This is where the Alpha BioMed drugs came from.
 - b. The Director of Pharmacy believed the drugs were purchased from Alpha BioMed for approximately one year.
 - c. Tara Scott, M.D., the clinic’s Responsible Person, stated she was unaware the unapproved drugs from Alpha BioMed were illegal.
 - d. Their process involved a clinic prescriber meeting with the patient, ordering the drug, compounding the drug at the clinic and personally furnishing the drug, an ice pack and syringes. The patient would occasionally self-administer the initial dose at the clinic.

POTENTIAL VIOLATIONS OF LAW

1. Such conduct as set forth in the Allegations Section, if proven, 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 adulterated¹ 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

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

² ORC Section 3715.64: Misbranded drug or device

- c. The receipt in commerce of any food, drug, device, or cosmetic that is adulterated or misbranded, and the delivery or proffered delivery thereof for pay or otherwise, ORC Section 3715.52(A)(3); and/or
 - d. 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); and/or
 - e. The dissemination of any false advertisement, ORC Section 3715.52(A)(5).
2. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of Section 4729.51(F) of the ORC, effective September 29, 2017 and April 6, 2017, No licensed terminal distributor of dangerous drugs or person that is exempt from licensure under section 4729.541 of the Revised Code shall purchase dangerous drugs or investigational drugs or products from any person other than a licensed manufacturer, outsourcing facility, third-party logistics provider, repackager, or wholesale distributor, each violation is a misdemeanor of the first degree, each violation punishable by a maximum penalty of \$5,000 if committed by an organization.
 3. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of section 2925.09(A) of the ORC, 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 a felony of the fifth degree, 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, constitutes a violation of section 3715.68(A) of the ORC, An advertisement of food, drug, device, or cosmetic is false if it is false or misleading in any particular, each violation punishable by a maximum penalty of \$1,000 if committed by an organization.
 5. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of Section 4729.60(B) of the ORC, Before a licensed terminal distributor of dangerous drugs may purchase dangerous drugs at wholesale, the terminal distributor shall query the roster established pursuant to section 4729.59 of the Revised Code to confirm the seller is licensed to engage in the sale or distribution of dangerous drugs at wholesale, each violation punishable by a maximum penalty of \$1,000 if committed by an organization.
 6. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of the following sections of Rule 4729:5-3-04 of the OAC, as effective March 1, 2019, each violation punishable by a maximum penalty of \$1,000:
 - a. Before a terminal distributor of dangerous drugs may purchase dangerous drugs at wholesale, the terminal distributor shall query the board's online roster (available on the board's website: www.pharmacy.ohio.gov) to confirm any of the following:
 - i. The seller is licensed to engage in the sale of dangerous drugs in accordance with section 4729.52 of the Revised Code, OAC Rule 4729:5-3-04(A)(1); and/or

- ii. The seller is licensed to engage in the occasional sale or distribution of dangerous drugs at wholesale in accordance with rule 4729:5-3-09 of the Administrative Code, OAC Rule 4729:5-3-04(A)(2); and/or
 - b. If no documented query is conducted before a purchase is made, it shall be presumed that the purchase of dangerous drugs by the terminal distributor is in violation of section 4729.51 of the Revised Code, OAC Rule 4729:5-3-04(B).
7. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of section 4729.291(A) of the ORC, Drugs personally furnished by prescriber- Except when provided under section 4731.97 of the Revised Code, when a licensed health professional authorized to prescribe drugs personally furnishes drugs to a patient pursuant to division (B) of section 4729.29 of the Revised Code, the prescriber shall ensure that the drugs are labeled and packaged in accordance with state and federal drug laws and any rules and regulations adopted pursuant to those laws. Records of purchase and disposition of all drugs personally furnished to patients shall be maintained by the prescriber in accordance with state and federal drug statutes and any rules adopted pursuant to those statutes, each violation punishable by a maximum penalty of \$1,000 if committed by an organization.
 8. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of the following sections of Rule 4729:5-2-01 of the OAC, as effective 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).
 9. 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 4, 2026, TDDD license requirements, each violation punishable by a maximum penalty of \$1,000:
 - a. One of the following will maintain supervision and control over the possession and custody of dangerous drugs and controlled substances that may be acquired by or on behalf of the applicant: A ... licensed health professional authorized to prescribe drugs, or other person authorized by the board, ORC 4729.55(B)(1); 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).
10. 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. 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. Violating any provision of the federal drug abuse control laws or Chapter 2925. or 3719. of the Revised Code, ORC Section 4729.57(B)(5); and/or
 - e. Falsely or fraudulently promoting to the public a dangerous drug, except that nothing in this division prohibits a terminal distributor of dangerous drugs from furnishing information concerning a dangerous drug to a health care provider or another licensed terminal distributor; ORC Section 4729.57(B)(6); and/or
 - f. 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
 - g. 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).
11. 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. 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. Violating any provision of the federal drug abuse control laws or Chapter 2925. or 3719. of the Revised Code, OAC Rule 4729:5-4-01(B)(5); and/or

- e. 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
 - f. 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); and/or
 - g. 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
 - h. 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).
12. Such conduct as set forth in the Allegations Section, if proven, constitutes a violation of the following sections of Rule 4729:7-3-04 of the OAC, as effective February 28, 2026, each violation punishable by a maximum penalty of \$1,000:
- a. The responsible person of a facility where a prescriber is engaged in the compounding of immediate-use, sterile non-hazardous dangerous drug preparations in accordance with paragraph (B) of this rule shall be responsible for all the following:
 - i. Developing and implementing appropriate compounding procedures, OAC Rule 4729:7-3-04(A)(1); and/or
 - ii. Overseeing facility compliance with this rule, OAC Rule 4729:7-3-04(A)(2); and/or
 - iii. Compliance with Title 21 U.S.C. section 353a (11/27/2013) and all other applicable federal and state laws, regulations and rules, OAC Rule 4729:7-3-04(A)(3); and/or
 - iv. Ensuring training and competency of compounding personnel, OAC Rule 4729:7-3-04(A)(4); and/or
 - v. Ensuring that compounded drug preparations maintain quality and sterility until administered, OAC Rule 4729:7-3-04(A)(5); and/or
 - vi. Maintaining drug compounding records pursuant to rule 4729:7-3-06 of the Administrative Code, OAC Rule 4729:7-3-04(A)(6); and/or
 - vii. The proper maintenance, cleanliness, and use of all equipment used in compounding, OAC Rule 4729:7-3-04(A)(7); and/or
 - viii. Ensuring aseptic technique for the preparation of all sterile compounded drugs, OAC Rule 4729:7-3-04(A)(8); and/or

- b. Immediate-use, sterile compounded drug preparations are exempt from the requirements in rule 4729:7-3-03 of the Administrative Code if all the following criteria are met:
 - i. The compounding process involves the simple transfer of not more than three commercially manufactured packages of sterile, non-hazardous drugs from the manufacturers' original containers and not more than two entries into any one container or package (e.g., bag, vial) of sterile infusion solution or administration container/device, OAC Rule 4729:7-3-04(B)(1); and/or
 - ii. The beyond-use date for an immediate-use compounded drug preparation is as follows:
 - 1. Except as provided in paragraph (B)(4)(b) of this rule, no later than six-hours following preparation of the drug, OAC Rule 4729:7-3-04(B)(4)(a); and/or
 - 2. For preparations of buffered lidocaine containing antimicrobial preservatives, no later than twelve-hours following preparation of the drug, OAC Rule 4729:7-3-04(B)(4)(b); and/or
 - iii. If administration has not begun within the beyond-use dating described in paragraph (B)(4) of this rule, the drug shall be promptly, properly, and safely disposed. Records of disposal shall be maintained in accordance with rule 4729:7-3-06 of the Administrative Code, OAC Rule 4729:7-3-04(B)(5); and/or
 - iv. Unless administered immediately, the compounded drug preparation shall bear a label listing all the following:
 - 1. Except for preparations compounded in accordance with paragraph (G)(2) of this rule, patient identification information, including the patient's first and last name, OAC Rule 4729:7-3-04(B)(6)(a); and/or
 - 2. The name and quantity of each ingredient, OAC Rule 4729:7-3-04(B)(6)(b); and/or
 - 3. The beyond-use date and time prepared, OAC Rule 4729:7-3-04(B)(6)(c); and/or
 - 4. The name or initials of the person who prepared the compounded drug preparation, OAC Rule 4729:7-3-04(B)(6)(d); and/or
 - v. Immediate-use compounded drug preparations are for administration only and shall not be personally furnished by a prescriber, OAC Rule 4729:7-3-04(B)(7); and/or
- c. Unless administered within one-hour of preparation, sterile compounded drug preparations for immediate-use shall be prepared in a designated clean medication area that is not adjacent to areas where potentially contaminated or hazardous items are placed. Such an area shall be limited to compounding personnel and shall not be in a location that has unsealed windows or doors that connect to the outdoors or high traffic flow, or that is adjacent to construction sites, warehouses, or food preparation. Cleaning and disinfection agents must be selected and used

with careful consideration of compatibility, effectiveness, and inappropriate or toxic residues. Cleaning and disinfecting shall occur before compounding is performed. This shall be followed by wiping with a residue-free disinfecting agent, such as sterile seventy per cent isopropyl alcohol, which is allowed to dry before compounding begins, OAC Rule 4729:7-3-04(C); and/or

- d. Preparations that do not meet all the requirements listed in paragraph (B) of this rule shall comply with the requirements in rule 4729:7-3-03 of the Administrative Code, OAC Rule 4729:7-3-04(E); and/or
 - e. Records of drug compounding shall be maintained pursuant to rule 4729:7-3-06 of the Administrative Code, OAC Rule 4729:7-3-04(H); and/or
 - f. For all compounded drugs prepared pursuant to this rule, a prescriber shall:
 - i. Inspect and approve the compounding process, OAC Rule 4729:7-3-04(L)(1); and
 - ii. Except as provided in paragraph (M) of this rule, perform medication validation ("final check") prior to the medication being administered, OAC Rule 4729:7-3-04(L)(2).
13. Such conduct as set forth in the Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:7-3-06 of the OAC, as effective March 31, 2021, each violation punishable by a maximum penalty of \$1,000:
- a. The responsible person shall maintain the following records relating to the compounding of dangerous drugs:
 - i. Records of each drug compounded shall, at a minimum, include all the following:
 - 1. Beyond-use date of the compounded drug, Rule 4729:7-3-06(A)(3)(f); and
 - 2. The positive identification of the personnel responsible for compounding the drug, Rule 4729:7-3-06(A)(3)(g); and
 - 3. The positive identification of either of the following:
 - a. Person or persons performing medication validation prior to the compounded drug being administered, Rule 4729:7-3-06(A)(3)(h)(i); and/or
 - b. The prescriber personally furnishing the compounded drug, Rule 4729:7-3-06(A)(3)(h)(ii); and
 - b. All records maintained in accordance with this rule shall be readily retrievable and shall be kept on-site for a period of three years.
14. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of the following sections of Rule 4729:5-3-14(A) of the OAC, as effective March 1, 2020, each violation punishable by

a maximum penalty of \$1,000: All terminal distributors of dangerous drugs shall provide effective controls and procedures to: Ensure supervision and control of dangerous drugs, as required in division (B) of section 4729.55 of the Revised Code, and adequate safeguards to ensure that dangerous drugs are being distributed in accordance with all state and federal laws, as required in section 4729.55 of the Revised Code, OAC Rule 4729:5-3-14(A)(2).

15. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of the following sections of Rule 4729:5-19-02(F)(3) of the OAC, as effective April 1, 2026, each violation punishable by a maximum penalty of \$1,000: Pursuant to rule 4729:7-3-04 of the Administrative Code, a prescriber shall not personally furnish immediate-use compounded drug preparations.
16. Such conduct as set forth in Allegations Section, if proven, each constitutes a violation of the following sections of Rule 4729:5-19-03 of the OAC, as effective April 1, 2026, each violation punishable by a maximum penalty of \$1,000:
 - a. The security and control of dangerous drugs is the responsibility of the responsible person on the terminal distributor of dangerous drugs license and the terminal distributor of dangerous drugs, OAC Rule 4729:5-19-03(A); and/or
 - b. All areas where dangerous drugs and devices are stored shall be dry, well-lit, well-ventilated, and maintained in a clean and orderly condition. Storage areas shall be maintained at temperatures and conditions which will ensure the integrity of the drugs prior to use as stipulated by the USP/NF and/or the manufacturer's or distributor's labeling. Refrigerators and freezers used for the storage of drugs and devices shall comply with the following:
 - i. Maintain either of the following to ensure proper refrigeration and/or freezer temperatures are maintained:
 1. Temperature logs with, at a minimum, daily observations, OAC Rule 4729:5-19-03(K)(1)(a); or
 2. A temperature monitoring system capable of detecting and alerting staff of a temperature excursion, OAC Rule 4729:5-19-03(K)(1)(b); and/or
 - ii. The terminal distributor shall develop and implement policies and procedures to respond to any out of range individual temperature readings or excursions to ensure the integrity of stored drugs, OAC Rule 4729:5-19-03(K)(2).
17. Such conduct as set forth in Allegations Section, if proven, constitutes a violation of the following sections of Rule 4729:5-19-04 of the OAC, as effective April 1, 2026, each violation punishable by a maximum penalty of \$1,000:
 - a. A clinic or prescriber office shall keep a record of all dangerous drugs received, administered, personally furnished, disposed, sold or transferred, OAC Rule 4729:5-19-04(A); and/or

- b. Records of receipt shall contain the name, strength, dosage form, and quantity of the dangerous drugs received, the name and address of the seller, the name and address of the recipient, and the date of receipt. An invoice from a drug distributor licensed in accordance with division 4729:6 of the Administrative Code containing the required information may be used to meet this requirement, OAC Rule 4729:5-19-04(B); and/or
- c. Records of temperature control monitoring described in paragraph (K)(1) of rule 4729:5-19-03 of the Administrative Code shall include any of the following:
 - i. For temperature logs, either:
 - 1. The date and time of observation, the full name or the initials of the individual performing the check, and the temperature recorded, OAC Rule 4729:5-19-04(C)(1)(a); and/or
 - 2. For systems that provide automated temperature monitoring, maintain a report that provides, at a minimum, the date and time of observation and the temperature recorded, OAC Rule 4729:5-19-04(C)(1)(b); and/or
 - ii. For temperature monitoring systems capable of detecting and alerting staff of a temperature excursion, maintain reports that provide information on any temperature excursion that includes the date, time, temperature recorded, and length of each excursion, OAC Rule 4729:5-19-04(C)(2); and/or
- d. All records maintained in accordance with this rule and rule 4729:5-19-03 of the Administrative Code shall be readily retrievable and shall be kept on-site for a period of three years, OAC Rule 4729:5-19-04(J).

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/alg/jrn

Encl: Attachment A

cc: Judith Rodriguez, State Medical Board of Ohio, at: Judith.Rodriguez@med.ohio.gov



ATTACHMENT A

**Alpha BioMed Unapproved Drugs observed at Revitalize Medical Group on
September 9, 2026**

Unapproved Drugs Seized			
Drug Name/Strength	Lot Number	Number of Vials	Categorization
Glow 50: GHK-Cu/BPC-157/TB-500 30mg/10mg/10mg vial	GLO50N061226	9	GHK-Cu injectable route, BPC-157 and TB-500: Not approved, added to Category 2 on 9/29/23, removed 4/22/26
Semax 30mg vial	5MX30N030626	4	Not approved, added to Category 2 on 9/29/23, removed 4/22/26
Selank 10mg vial	SLNK-01122026-J	5	Not approved, added to Category 2 on 9/29/23, removed 9/27/24
Selank 5mg vial	SEL12142025S	5	Not approved, added to Category 2 on 9/29/23, removed 9/27/24
Tesamorelin 10mg vial	TES10N092525	6	Biologic
2X Blend Tesamorelin/Ipamorelin 5mg/5mg vial	2X10N072325	6	Tesamorelin: biologic Ipamorelin: not approved, added to Category 2 on 9/29/23, removed on 9/27/24
2X Blend Tesamorelin/Ipamorelin 10mg/2mg vial	2X12N093025	3	Tesamorelin: biologic Ipamorelin: not approved, added to Category 2 on 9/29/23, removed on 9/27/24
BPC-157/TB-500 10mg/10mg vial	TBB20N060226	10	BPC-157 and TB-500: Not approved, added to Category 2 on 9/29/23, removed 4/22/26
BPC-157/TB-500 10mg/10mg vial	BPTB20-12152025-J	1	BPC-157 and TB-500: Not approved, added to Category 2 on 9/29/23, removed 4/22/26