

**COMMONWEALTH OF MASSACHUSETTS
Board of Registration in Pharmacy**

**NOTICE OF THE REGULARLY SCHEDULED MEETING OF THE
BOARD OF REGISTRATION IN PHARMACY**

March 1, 2016
239 Causeway Street ~ Room 417 A&B
Boston, Massachusetts 02114

Agenda

Time	#	Item	Exhibits	Contact
8:30	I	CALL TO ORDER		E. Taglieri
8:35	II	APPROVAL OF AGENDA Introduction of Pharmacy Intern(s)		
8:40	III	APPROVAL OF BOARD MINUTES <ul style="list-style-type: none"> • Draft of February 2, 2016 Regular Session Minutes 		
8:45	IV	APPLICATIONS <ul style="list-style-type: none"> • Maida Pharmacy –Petition for waiver • Biocair, Inc. – Wholesale Distributor • ArxCare, LLC – New Community Pharmacy • ProCare – New Community Pharmacy • Nimble Pharmacy – New Community Pharmacy 		
9:45	V	REPORTS <ul style="list-style-type: none"> • Applications approved pursuant to Licensure Policy 13-01 • Monthly Report from Probation 	Reports	R. Harris K. Fishman
9:50	VI	FLEX SESSION <ul style="list-style-type: none"> •MPJE Item Development Workshop, March 2016 •PMP Program Update 		D. Sencabaugh T. Fensky
10:10	VII	POLICIES <ul style="list-style-type: none"> • Policy 16-01: Proposed amendments to Staff Action on Applications pertaining to Outsourcing Facilities • Proposed guidance for filing DEA 106 forms and responding to inventory discrepancies. 		

10:25	VIII	<p>Notice of Violation and Recommendation for Further Discipline</p> <ol style="list-style-type: none"> 1. M. Kahl, PT 111496,PHA-2014-0048 2. R. Patz, PT 14511, PHA-2014-0072 		K. Fishman
10:40	IX	<p>REGULATIONS</p> <ul style="list-style-type: none"> • Proposed amendments to 247 CMR 16:00 -Collaborative Practice • Proposed new regulations 247 CMR 19:00 – Hazardous Drugs 		H. Engman K. Barnes
11:30	X	<p>FILE REVIEW</p> <ol style="list-style-type: none"> 1. PHA-2015-0124, Rite Aid #10151, DS3122 2. SA-INV-8511, Rite Aid #10145, DS3346 3. SA-INV-8450, Rite Aid #10184, DS3091 4. SA-INV-7480, Soleo Pharmacy, DS89958 5. PHA-2015-0178, CVS #1877,DS3010 6. SA-INV-8512, Stop and Shop #79, DS2689 		
12:00	XI	<p>EXECUTIVE SESSION</p> <p>The Board will meet in Executive Session as authorized pursuant to M.G.L. c. 30A, § 21(a)(1) for the purpose of discussing the reputation, character, physical condition or mental health, rather than professional competence, of an individual, or to discuss the discipline or dismissal of, or complaints or charges brought against, a public officer, employee, staff member or individual.</p> <p>Specifically, the Board will discuss and evaluate the Good Moral Character as required for registration for pending applicants.</p>		CLOSED SESSION
12:30		LUNCH BREAK		
1:30	XI	EXECUTIVE SESSION CONTINUED		CLOSED SESSION
3:00	XII	ADJUDICATORY SESSION (M.G.L. c. 30A, § 18)		CLOSED SESSION
3:30	XIII	M.G.L. c. 112, § 65C SESSION		CLOSED SESSION
5:00	XIV	ADJOURNMENT		

**COMMONWEALTH OF MASSACHUSETTS
BOARD OF REGISTRATION IN PHARMACY**

**MINUTES OF THE REGULARLY SCHEDULED MEETING
239 Causeway Street, Fourth Floor Room 417A
Boston Massachusetts, 02114**

March 1, 2016

Board Members Present

Edmund Taglieri Jr., R.Ph, MSM, NHA
President
Timothy Fensky, R.Ph, FACA
President –elect
Michael Godek, R.Ph, Secretary
Phillippe Bouvier, R.Ph.
Catherine Basile, Pharm D, R.Ph
Susan Cornacchio, JD
William Cox CPhT
Dr. Ali Raja, MD, M.B.A., M.P.H. (arrived at 8:54a.m.)
Andrew Stein, Pharm D, R.Ph.
Richard Tinsley, MBA, M.Ed.,

Board Members Not Present

Patrick Gannon, RPh, MS
Garrett Cavanaugh, RPh
Karen Conley, RN, DNP

Board Staff Present

David Sencabaugh, RPh, Executive Director
William Frisch, Director of Pharmacy Compliance
Kelly Barnes, Director of Pharmacy Quality Assurance
Heather Engman, JD, MPH Board Counsel
Sam Leadholm, JD, Board Counsel
Richard Harris, Program Analyst
Monica Vasquez, Compliance Officer
Colleen Collins, PharmD, RPh. Pharmacy Investigator
Sam Penta, R. Ph., Pharmacy Investigator
James Lavery, Director DHPL

TOPIC: I

CALL TO ORDER 8:30 AM

DISCUSSION: A quorum of the Board was present, established by roll call. President E. TAGLIERI chaired the meeting and asked if anyone was recording. Hearing “no”, he explained that the Board of Pharmacy was recording the meeting. D. SENCABAUGH introduced APPE student P. Kornecki, from MCPHS University.

TOPIC II.

APPROVAL OF AGENDA

DISCUSSION: None

ACTION:

Motion by M. GODEK, seconded by, C. BASILE, and voted unanimously to approve the agenda.

TOPIC III.

APPROVAL OF BOARD MINUTES

1. Draft February 2, 2016, Regular Session Minutes

DISCUSSION: None

ACTION:

Motion by T. FENSKY, seconded by, R. TINSLEY, and voted unanimously to approve the minutes of the General Session from February 2, 2016. (A. RAJA had not yet arrived).

TOPIC IV:

APPLICATIONS

TIME: 8:34AM-9:26AM

1. Procare,

New Community Pharmacy

8:34AM

DISCUSSION: Procare, represented by Mr. Tom Lachapelle, R.Ph, COO and MOR, applied to open a Long Term Care Pharmacy in Southborough, MA, which will include sterile compounding. The facility plans to service approximately 3,000 beds. Director of Pharmacy Compliance Bill Frisch advised the Pharmacy Board members that he had reviewed their plans, and was comfortable with the proposal.

ACTION: Motion by M. GODEK, seconded by, C. BASILE, and voted unanimously, to approve the application for this New Community Pharmacy, pending successful inspection, and updated waiver and application (we cannot waive any part of 105 CMR). (A.RAJA had not yet arrived.)

2. Maida Pharmacy

Change of Services

DISCUSSION: Maida Pharmacy, a Drug Store located in Arlington, MA, notified the Board of Pharmacy of its intent to change from a full service pharmacy to a pharmacy that only does non-sterile compounding. There was no representative for Maida present at the meeting, however, there were two documents submitted on their behalf, one requesting the approval change the model, and the other stating that the prescription files and controlled substances would be transferred to Walgreens Pharmacy located at 324 Mass Ave in Arlington.

ACTION: Motion by T. FENSKY, seconded by P. BOUVIER, and voted unanimously, to approve the application for the Changer of Services offered by Maida. M. GODEK had recused himself since the files and inventory were going to a Walgreens, and was not present during the discussion or vote on this matter.

(A. RAJA had not yet arrived).

3. Biocare, Inc. Wholesale Distributor

DISCUSSION: Biocare is a wholesale distributor proposing to operate in Boston. They will be operating as a distributor for schedule VI products only.

ACTION: Motion by T. FENSKY, seconded by, W. COX, and voted unanimously, to approve the application for this Wholesale Distributor, pending successful inspection. A. Raja had arrived and was present for discussion and vote.

4. ArxCare, LLC New Community Pharmacy

DISCUSSION: ArxCare, located in Pembroke, MA, was represented by Michael Tocco and Benjamin Sturm from Integrated Pharmacy Solutions (consultants) and proposed MOR Frederick F. Meloy, JR. ArxCare plans to be a LTC pharmacy, servicing approximately 12 Nursing Home facilities at the start, from Braintree to the Cape. ArxCare answered the questions to the Board's satisfaction, however President E. TAGLIERI was concerned about their proposed multi-drug packaging system (demonstrated at the meeting), which he believes would be of concern to DPH. Taglieri told ArxCare representatives that he believes they need to request a waiver from DPH for this type packaging system, which, although OK by BOP standards, may require a waiver for Nursing Homes where nurses administer the drugs.

ACTION: Motion by R. TINSLEY, seconded by A. STEIN, and voted in the affirmative by all present Board Members, with the exception of Board President E. TAGLIRI, who was opposed. S. CORNACCHIO recused when it was revealed, two minutes into the discussion, that ArxCare would be serviced by Coram (CVS owned company) for sterile compounding needs.

5. Nimble Pharmacy New Community Pharmacy

RECUSAL: S. CORNACCHIO had recused herself and did not take part in the discussion or the voting on this matter.

DISCUSSION: Nimble Pharmacy, represented by MOR Margarita Surkis and Director of Operations, Mr. Taylor Helgren, was before the Board with this application for a new pharmacy in Watertown, MA in January, 2016, but the Board deferred final approval until the MOR could be present to answer some questions about the proposed operation. The new MOR, Ms. Surkis, answered questions about the pharmacist's schedule, PMP, Immunization, and the "Waiver to compound", to the Board's satisfaction.

ACTION: Motion by R. TINSLEY, seconded by, P. BOUVIER, and voted in the Affirmative by A. STEIN, A. RAJA, C. BASILE, E. TAGLIERI, R. TINSLEY, and P. BOUVIER to approve the application for this New Community Pharmacy, pending successful inspection, and appropriate waiver. Members T. FENSKY and M GODEK voted in the negative.

TOPIC V.
REPORTS

Applications Approved Pursuant to Licensure Policy 13-01

DISCUSSION: R. HARRIS noted that during the past month there have been twenty-five (25) change of managers, and one (1) closing since the last Board meeting.

ACTION: So noted

Report of activities Probation Monitor

DISCUSSION: D. SENCABAUGH provided the January 27, 2016 – February 22, 2016, Board of Pharmacy Statistics Report for the Probation monitor, which noted that: there are (57) licensees on probation, eight (8) satisfactorily completed probation, two (2) licensee did not cure within 30 days, and four (4) given the opportunity to cure.

ACTION: So noted

TOPIC VI.

Flex Session

1. MPJE Item Writing Workshop

DISCUSSION: D. SENCABAUGH updated the Board on the NABP MPJE Item-writing workshop schedule for March 15th and 16th, 2016 at NABP Headquarters in Mt. Prospect, IL. Board staff member Kelly Ann Barnes and Board Member Cathy Basile will be attending the workshop, which involves reviewing questions in the law exam banks for states.

2. PMP Program Update

DISCUSSION: Board Member T. FENSKY updated the Board on the changes to the PMP program expected by late spring / early summer 2016. The State will be switching vendors from Atlantic to Appriss, and the result should be a more user-friendly PMP, which will allow for interstate connectivity as well.

TOPIC VII:

POLICIES

A. PMP Update

Policy 16.01 Proposed Amendment to Staff Action on Applications for Outsourcing Facilities

10:01 am

DISCUSSION: Presented by Dave Sencabaugh. Amendments to allow staff action to approve facilities and deny certain applications. Allows Board to request additional information and deny license in certain situations. Clarified it would not be a disciplinary denial.

ACTION: At 10:11 am motion by T. FENSKY, seconded by C. BASILE, and voted unanimously to approve changes to Policy 16.01.

R. E. TAGLIERI: yes, R.TINSLEY: yes, M.GODEK: yes, S. CORNACCHIO: yes, P.BOUVIER: yes, A. STEIN: yes, T. FENSKY; yes, A. RAJA: yes, C. BASILE: yes
W. COX: yes

B. Policy 16.02 Proposed Guidelines for Filing DEA 106 forms and responding to inventory discrepancies.

9:30am

DISCUSSION: Presented by Director of Compliance W. FRISCH. Guidance for registrants to report controlled substances losses. Discussed steps for pharmacies to “get to the bottom” of a loss. This guidance is an effort to get more info regarding the investigation. R. TINSLEY inquired about getting monthly summaries of all DEA 106 reported losses. M. GODEK suggested clarifying the timeline for a response, and noted some of the items requested would take a lot of time. A. Stein suggested doing the biennial inventory more often. D. SENCABAUGH proposed to do exact inventory counts for CIII-CIV, and not just estimate.

ACTION: At 9:47 am, motion by A. STEIN seconded by R.TINSLEY, and voted unanimously to approve policy 16-02 and asked to put a 14 calendar day time frame in motion.

R. E. TAGLIERI: yes, R.TINSLEY: yes, M.GODEK: yes, S. CORNACCHIO: yes, P.BOUVIER: yes, A. STEIN: yes, T. FENSKY; yes, A. RAJA: yes, C. BASILE: yes
W. COX: yes

TOPIC VIII

NOTICE OF VIOLATION and RECOMMENDATION for FURTHER DISCIPLINE

10:04 am

1. M. Kahl, PT111496 PHA-2015-0048

Presented by Karen Fishman

DISCUSSION: K. Fishman referred to the report. Licensee signed disciplinary agreement on February 2, 2015 to submit 2 CE's in medication error prevention. There has not been any communication with BOP since the agreement was signed, and license has failed to submit CE's. Multiple attempts to communicate, letter was received May 1st, 2015. Suggestion made to change from stayed probation to reprimand, and would have an opportunity to appeal and submit CE's. Recommendation made to suspend or revoke license due to failure to respond. Offer hearing and time to submit CE.

ACTION: At 10:10 am, motion by R.TINSLEY seconded by T. FENSKY and voted unanimously to suspend M. Kahl's pharmacy technician license. E. TAGLIERI: yes, R.TINSLEY: yes, M.GODEK: yes, S. CORNACCHIO: yes, P.BOUVIER: yes, A. STEIN: yes, T. FENSKY; yes, A. RAJA: yes, C. BASILE: yes, W. COX: yes

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2. R. Patz, PT14511 PHA-2014-0072

10:11am

RECUSAL: S. CORNACCHIO recused herself and was not present during the discussion or vote for this matter.

DISCUSSION: Licensee signed disciplinary agreement for 2 CEs on October 30, 2015. No response submitted by licensee.

ACTION: At 10:15 am, motion by R.TINSLEY seconded by M. GODEK and voted unanimously to suspend R. Patz's pharmacy technician license.

R. E. TAGLIERI: yes, R.TINSLEY: yes, M.GODEK: yes, P.BOUVIER: yes, A. STEIN: yes, T. FENSKY; yes, A. RAJA: yes, C. BASILE: yes, W. COX: yes

TOPIC IX:

REGULATIONS

TIME: 10:19

Proposed amendments to 247 CMR 16.00:

Collaborative Drug Therapy Management

DISCUSSION: K. BARNES and H. ENGMAN provided proposed amendments to 247 CMR section 16.00. This section, which deals with Collaborative Drug Therapy Management, also had changes recently approved by the Board during the February 2, 2016 meeting. The changes in 16.02, presented to the Board at this meeting, primarily clarified the Pharmacist Qualifications required for pharmacists to be able to enter into a Collaborative Practice Agreement.

ACTION: Motion by M. GODEK, seconded by C. BASILE, and voted unanimous to approve the proposed amendments to 247 CMR 16.00, and proceed with the EO562 Administrative review process.

2. 247 CMR. 19.00:

Hazardous Drugs

DISCUSSION: W. FRISCH and K. BARNES presented the first look at a proposed new section, 247CMR 19.00, which will be dedicated to hazardous medications. The first pass included sections 19.01 – 19.08, and the Board reviewed line-by-line. Frisch explained that the new USP Section 800 was the foundation for the proposed new section.

ACTION: None Taken. The section discussion will continue during the next meeting.

TOPIC X:
OPEN FILE REVIEW

1. PHA-2015-0124 Rite Aid Pharmacy #10151, DS3122 TIME: 11:12 pm
RECUSAL: W.COX recused and was not present for the discussion or vote on this matter.

DISCUSSION: C.COLLINS presented and summarized the investigation report that pertain to these matters.

- Pharmacy had an inspectional deficiency in November, 2014 of improper pharmacist staffing ratios. Other deficiencies included BUD issues, cleanliness, and no hot water.
- An analysis of 3 months additional schedules revealed at least 75 dates of non-compliance with ratios due to the non-licensure of a certified tech. MOR stated this was due to counting an unlicensed certified tech as certified. However, there were still at least 60 other instances of non-compliance identified.
- The staff assignment was converted to a complaint and another 3 months of schedules from 2015 were analyzed with at least 21 additional dates of non-compliance.

ACTION: Motion by M. GODEK, seconded by T. FENSKY, and voted unanimously by those present, to issue a reprimand with an advisory letter on pharmacist to tech ratios and have the MOR attest to 247 CMR 8.03.

Case #2
SA-INV-8511 Rite Aid #10145, DS3346 TIME: 11:17 am
RECUSAL: W.COX recused and was not present for the discussion or vote on this matter.

DISCUSSION: M. VASQUEZ presented and summarized the investigation report that pertained to these matters.

- OPP received a DEA 106 report regarding a loss of #100 capsules of oxycodone 5mg tablets and #30 oxycodone 10mg tablets at Rite Aid #10145 Located in Norwood, MA (DS3346, Issued on 08/23/2004, 1 prior complaint.)
- Loss discovered during the weekly perpetual inventory count of oxycodone
- The report indicates that during the investigation of the loss, there was no evidence of theft or drug diversion.
- Pharmacists have received coaching on proper operational procedures. Store counts will be monitored and discrepancies promptly investigated.
- Company policy was reviewed with each pharmacist: Narcotics are to be double counted; the stock bottle is back counted; the prescription is logged in the perpetual inventory binder; the on hand quantity is verified; then the prescription can be dispensed. In addition, the perpetual inventory must be reconciled every 10 days

2/26/16: Pharmacy was inspected and MOR will submit a POC due to documented discrepancies in a return of a CII medication.

ACTION: Motion by T. FENSKY, seconded by S. CORNACCHIO, and voted unanimously by those present, to close SA-INV-8511 remediation completed.

Case #3

SA-INV-8450 CVS Pharmacy #10184 DS3091 TIME: 11:19 am

RECUSAL: W. COX recused and was not present for the discussion or vote on this matter.

DISCUSSION: M. VASQUEZ presented and summarized the investigation report that pertained to these matters.

- OPP received a DEA 106 report regarding a loss of #100 capsules of Methylphenidate CD 10mg and #2 Methylphenidate 5mg tablet.
- The report indicates that during the investigation of the loss, there was no evidence of theft or drug diversion and the store is continuing to monitor the inventory of the medication.
- During the investigation it was determined that the staff pharmacist had last dispensed the medication and had also discovered the loss during her weekly counts.
- Staff pharmacist indicated she is certain that she verifies the number of closed bottles as well as open bottles during her counts.
- She cannot remember if she took the whole bottle out of the safe at the time of dispensing the last prescription
- After loss prevention spoke with staff pharmacist and the pharmacy manager theft/diversion was not suspected
- Relevant policy and procedures were reviewed with staff.
- MOR also met with Asset Protection Manger, to identify root cause and confirm protocol going forward.
- MOR reviewed proper procedures for handling and dispensing of CII medications with staff.

Recommendation to close staff assignment

Noted two month delay in reporting DEA 106 form

ACTION: Motion by T. FENSKY, seconded by A. STEIN, and voted unanimously by those present to close staff assignment pending remediation.

ACTION: Motion by M. GODEK, seconded by R. TINSLEY and voted unanimously by those present to open a complaint against the MOR secondary to the delay in reporting DEA 106 loss.

Case #4

SA-INV-7480

Soleo Pharmacy, DS89958

TIME: 11:23 am

RECUSAL: None

DISCUSSION: C. COLLINS presented and summarized the investigation report that pertained to these matters.

- Registrant reported 1 cfu/400 L (2.5 cfu/m³) gram negative rod and 1 cfu/plate mold both isolated from the buffer room.
- Soleo was not compounding as they had not opened yet.
- Soleo had a delayed opening as the proposed room was not consistent with the blueprints submitted to the Board – found on initial inspection.

Soleo addressed the issue and had a follow up 797 inspection in July with no deficiencies noted and the Pharmacy then opened.

ACTION: Motion by A. STEIN, seconded by C. BASILE, and voted unanimously by those present to close assignment with no violations based on completed remediation.

Case #5

PHA-2015-0178

CVS Pharmacy #1877, DS3010

TIME: 11:25 am

RECUSAL: S. CORNACCHIO

DISCUSSION: C. COLLINS presented and summarized the investigation report that pertained to these matters.

- CVS Pharmacy #1877 reported a loss of 320 lorazepam 0.5mg tablets and 228 Suboxone 8 mg / 2 mg tablets were lost or stolen.
- Discovered April 22, 2015.
- Reviewed video, monitored employees and monitored counts daily for 30 days.
- MOR submitted their controlled substance policies and procedures which includes regular bag/smock checks.
- CVS was unable to account for the loss and the matter was closed.

Staff assignment was converted to a complaint; CVS responded and stated that there was no new evidence in this case and they have already provided all of the information regarding this investigation to the Board.

ACTION: Motion by T. FENSKY, seconded by C. BASILE, and voted unanimously by those present to issue a reprimand.

Case #6

SA-INV-8512

Stop & Shop #79, DS2689

TIME: 11:28 am

RECUSAL: None

DISCUSSION: M. VASQUEZ presented and summarized the investigation report that pertained to these matters.

- During a retail pharmacy compliance inspection conducted on August 31, 2015, a Pharmacy Investigator cited a technician in training who had exceeded their tech in trainee hours.
- Technician in trainee had accumulated approximately 2000 hours.
- He indicated he had Submitted his application in July to PCS but as of September had not heard back.
- Technician received his registration on September 17, 2015.
- Stop and Shop has updated their policy and procedures for better monitoring of tech in trainee hours.

February 18, 2016 inspection revealed no deficiencies and all staff is up to date with their licenses.

ACTION: Motion by P. BOUVIER, seconded by C. BASILE, and voted unanimously by those present to close assignment, discipline not warranted, remediation completed.

TOPIC XI.

EXECUTIVE SESSION:

DISCUSSION: None

ACTION: at 1:34PM motion by R. TINSLEY, seconded by C. BASILE, and voted unanimously by roll call to enter into Executive Session: E. TAGLIERI; yes, T. FENSKY; yes, M. GODEK; yes, P. BOUVIER; yes, C. BASILE; yes, S. CORNACCHIO; yes, W. COX; yes, A. RAJA; yes, A. STEIN; yes, R. TINSLEY; yes.

TOPIC XII.

ADJUDICATORY SESSION: at 11:35AM, motion by T. FENSKY, seconded by R, TINSLEY, and voted unanimously to enter Adjudicatory Session:

TOPIC XIII.

M.G.L. c. 65C Session

DISCUSSION: None

ACTION: At 2.34PM motion by R. TINSLEY, seconded by C. BASILE and voted unanimously to enter into M.G.L. c. 65C Session.

TOPIC XIV.

ADJOURNMENT OF MEETING

DISCUSSION: NONE

ACTION: At 4:47PM motion by M. GODEK, seconded by C. BASILE, and voted unanimously to adjourn the meeting.

LIST OF EXHIBITS USED DURING THE OPEN SESSION OF THE MEETING

1. Draft Agenda for the March 1, 2016, regularly scheduled meeting of the Board of Registration in Pharmacy.
2. Draft February 2, 2016 Open Session Minutes.
3. Application to Operate and Manage a New Community Drugstore, Nimble Pharmacy.
4. Application to Operate and Manage a New Community Drugstore, ProCare, LLC
5. Application to Operate and Manage a New Community Drugstore, ArxCare, LLC
6. Application to Operate and Manage a Wholesale Distributor, Biocair, Inc.
7. Application for Change of service Non-Sterile Compounding only, Maida Pharmacy, Inc.
8. Report of Applications approved pursuant to licensure policy 13-01
9. Report from Probation Monitor
10. Draft proposed Policy amendments to 247 CMR 16-01, Outsourcing Facilities
11. Draft new proposed Policy 16-02 Guidance for Filing DEA 106 Forms
12. Memorandum on Macella Kahl, PT11496, PHA-2014-0048
13. Memorandum on Rosemary Patz, PT14511, PHA-2014-0072
14. Draft proposed amendments to 247 CMR 16.00: Collaborative Practice
15. Draft proposed new regulation 247 CMR 19.00: Hazardous Drugs
16. Investigation report in the matter of Rite Aid Pharmacy #10151, PHA-2015-0124
17. Investigation report in the matter of Rite Aid Pharmacy #10145, SA-INV-8511
18. Investigation report in the matter of Rite Aid Pharmacy #10184, SA-INV-8450
19. Investigation report in the matter of Soleo Pharmacy, SA-INV-7480.
20. Investigation report in the matter of CVS #1877, PHA-2015-0178.
21. Investigation report in the matter of Stop & Shop Pharmacy #79, SA-INV-8512.

Respectfully submitted by:
M. GODEK, R.Ph.
