IN THE MATTER OF

BEFORE THE MARYLAND

ANAZAOHEALTH CORPORATION *

STATE BOARD OF

Respondent

PHARMACY

Wholesale Distributor Permit: D05656 *

Case Number: 25-024

Pharmacy Permit: P06892

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On March 19, 2025, the Maryland State Board of Pharmacy (the "Board") charged **ANAZAOHEALTH CORPORATION** (the "Respondent"), Wholesale Distributor Permit Number: **D05656** and Pharmacy Permit Number: **P06892**, under the Maryland Pharmacy Act, (the "Act") Md. Code Ann., Health Occ. §§ 12-101 *et seq.* (2021 Repl. Vol. & 2024 Supp.).

The Board charged the Respondent with violating the following provisions of Md. Code Ann., Health Occupations ("Health Occ."):

Health Occ. § 12-403. Required standards.

- (e) A nonresident pharmacy shall:
 - (1) Hold a pharmacy permit issued by the Board;
- § 12-409. Suspensions and revocations Grounds.
- (b) (1) A nonresident pharmacy is subject to the disciplinary actions stated in this subtitle.
 - (2) The Board may fine a nonresident pharmacy in accordance with § 12-410 of this subtitle or deny, revoke, or suspend the permit of a nonresident pharmacy for any violation of § 12-403(e) through (h) of this subtitle.

Health Occ. § 12-410. Penalty instead of suspension or in addition to suspension or revocation.

- (a) If after a hearing under § 12-411 of this subtitle the Board finds that there are grounds under § 12-409 of this subtitle to suspend or revoke a permit, the Board may impose a penalty not exceeding \$10,000:
 - (1) Instead of suspending the permit; or
 - (2) In addition to suspending or revoking the permit.

Health Occ. § 12-601. Disciplinary actions.

- (a) Subject to the hearing provisions of § 12-315 of this title, for a violation of this subtitle, Subtitle 6C of this title, or any regulation adopted under Subtitle 6C of this title, the Board may:
 - (1) Deny a permit to an applicant;
 - (2) Reprimand a permit holder;
 - (3) Place a permit holder on probation; or
 - (4) Suspend or revoke a permit.

Health Occ. § 12-6C-03. Permit required.

- (a) A wholesale distributor shall hold a permit issued by the Board before the wholesale distributor engages in wholesale distribution in the State.
- (b)(1) A manufacturer engaged in wholesale distribution shall hold a wholesale distributor permit issued under this subtitle.

Health Occ. § 12-6C-11. Violations; penalties.

(a)(1) If a person knowingly violates any provision of this subtitle or any regulation adopted under this subtitle, the Board may impose a fine not to exceed \$500,000.

Health Occ. § 12-703. Operating a pharmacy without permit.

A person may not establish or operate a pharmacy in this State or a nonresident pharmacy unless the person holds a pharmacy permit issued by the Board.

Health Occ. § 12-707. Penalties; report of convictions.

. . .

(e)(1) Any person who violates § 12-701 ("Practicing pharmacy without a license"), § 12-703 ("Operating a pharmacy without a permit"), § 12-6B-12 ("Working as an unregistered pharmacy technician"), or § 12-6D-15 ("Practicing as an unregistered pharmacy intern") of this title is subject to a civil fine of not more than \$50,000 to be assessed by the Board.

On May 14, 2025, a Case Resolution Conference ("CRC") was held before a panel of the Board. As a resolution of this matter, the Respondent agreed to enter this public Consent Order consisting of Findings of Fact, Conclusions of Law, and Order.

FINDINGS OF FACT

The Board finds:

- 1. The Respondent is a corporation; registered as an outsourcing facility under § 503(b) of the Federal Food, Drug, and Cosmetic Act; with a facility located in Las Vegas, Nevada.
- 2. On or about September 4, 2015, the Board issued the Respondent a permit to operate as a wholesale distributor in the State of Maryland under permit number D05656. The Respondent's permit to operate as a wholesale distributor in the State of Maryland expired on May 31, 2023.
- 3. On or about November 18, 2015, the Board issued the Respondent a permit to operate as a nonresident pharmacy in the State of Maryland under permit number

- P06892. The Respondent's permit to operate as a nonresident pharmacy in the State of Maryland expired on May 31, 2024.
- 4. On or about July 25, 2024, the Board received an Application for Manufacturers and Virtual Manufacturers Distributing their own Prescription Drugs or Devices from the Respondent.
- 5. On or about September 12, 2024, an investigator from the United States Drug Enforcement Administration ("DEA") contacted the Board concerning the Respondent, stating that "[t]here were 1,474 distributions after 05/31/2023 through 05/22/2024."
- 6. On or about August 7, 2024, the Board issued a *subpoena duces tecum* to the Respondent, seeking a complete copy of "any and all reports for all prescription products dispensed, distributed, or sold into Maryland for the time period of April 1, 2024 to August 1, 2024." The Respondent produced a responsive report (the "Report"). According to the Report, from April 1, 2024, through May 22, 2024, inclusive, the Respondent distributed 495 prescription drugs to locations in the State of Maryland. From May 23, 2024, through August 1, 2024, inclusive, the Respondent distributed 684 prescription drugs to locations in the State of Maryland. From June 10, 2024, through July 19, 2024, the Respondent dispensed 7 prescription products to locations in the State of Maryland.
- 7. On or about November 19, 2024, the Vice President of Operations for the Respondent sent a letter to the Board. The letter acknowledged that permit numbers D05656 and P06892 had lapsed. The letter stated that "a longtime (10+ year), trusted employee who had long been assigned with maintaining facility licenses inexplicably stopped doing this part of her job."

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Board concludes as a matter of law the following:

- 8. By engaging in wholesale distribution in the State of Maryland while not holding a permit issued by the Board, the Respondent violated Health Occ. § 12-6C-03(a) and (b)(1).
- 9. By operating as a pharmacy and/or nonresident pharmacy while not holding a permit issued by the Board, the Respondent violated Health Occ. § 12-403(e)(1) and Health Occ. § 12-703.
- 10. By participating in activities, as outlined in the Allegations of Fact above, Respondent-Pharmacy violated Health Occ. § 12-403(e)(1), Health Occ. § 12-6C-03(a) and (b)(1), and Health Occ. § 12-703.

<u>ORDER</u>

Based on the foregoing Findings of Fact and Conclusions of Law, on the affirmative vote of a majority of the Board, it is hereby:

ORDERED that the Respondent shall pay a monetary fine in the amount of \$15,000, payable within one (1) year of the effective date of the Consent Order, payable by certified check or money order to The Maryland State Board of Pharmacy and sent to:

Wells Fargo Bank Attn: State of MD - Board of Pharmacy Lockbox 2051 401 Market Street Philadelphia, PA 19106 Please reference Case Number 25-024 – AnazaoHealth Corporation on your check or money order to ensure proper assignment to your case; and it is further

ORDERED that the Respondent shall operate in accordance with the laws and regulations governing the wholesale distribution of prescription drugs, including controlled dangerous substances, into the State of Maryland; and it is further

ORDERED that the Respondent shall bear the cost(s) of complying with the Consent Order; and it is further

ORDERED that the Respondent shall at all times cooperate with the Board in the monitoring, supervision, and investigation of its compliance with the terms and conditions of this Order; and it is further

ORDERED that the failure to comply with the terms and conditions of the Consent Order, including failure to pay the monetary fine in full by the deadline, constitutes a violation of the Consent Order and the Board, in its discretion, after notice and an opportunity for a show cause hearing before the Board, may impose any appropriate sanction under the Act; and it is further

ORDERED that the Consent Order shall be a public document pursuant to Md. Code Ann., Gen. Prov. § 4-101 et seq. (2019 Repl. Vol. & 2024 Supp.).

6-2-25 Date

President Maryland Board of P

President, Maryland Board of Pharmacy

CONSENT

I, Hal Weaver, President of AnazaoHealth Corporation, acknowledge that I have

had the opportunity to consult with legal counsel before signing this document. By this

Consent, I accept, on behalf of AnazaoHealth Corporation to be bound by this Consent

Order and its conditions and restrictions. On its behalf, I waive any rights AnazaoHealth

Corporation may have had to contest the Findings of Fact and Conclusions of Law.

I acknowledge the validity of this Consent Order as if entered into after the

conclusion of a formal evidentiary hearing in which AnazaoHealth Corporation would have

had the right to counsel, to confront witnesses, to give testimony, to call witnesses on its

behalf and to all other substantive and procedural protections as provided by law.

I acknowledge the legal authority and the jurisdiction of the Board to initiate these

proceedings and to issue and enforce this Consent Order. I also affirm that I am waiving

AnazaoHealth Corporation's right to appeal any adverse ruling of the Board that might

have followed any such hearing.

I sign this Consent Order without reservation, and I fully understand and

comprehend the language, meaning and terms of this Consent Order. I voluntarily sign

this Order on behalf of AnazaoHealth Corporation and understand its meaning and effect.

5/28/2025

Hal Weaver

President

AnazaoHealth Corporation

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NOTARY

STATE OF Florida	
CITY/COUNTY OF	tills borough.
I hereby certify that on this before me, a Notary Public of the aforesaid, personally appeared Hall Consent Order was his voluntary as	day of May , 2025, he State of Florida and City/County Weaver and made an oath in due form that the foregoing ct and deed.
AS WITNESS, my hand and Not	ary Seal.
Notary Public State of Florida Abble J. Oliver My Commission HH 666227 Expires 5/10/2029	Notary Public J. Dlum
	My commission Expires: 5/10/2029

Notary Public State of Florida B Abbie J. Oliver My Compilerian HA 648227 B Expires \$110/2029