IN THE MATTER OF	BEFORE THE
BOOTHWYN PHARMACY	MARYLAND STATE
Respondent	BOARD OF PHARMACY
Permit Number: P05923	Case Number: 25-422B

CONSENT ORDER

On April 15, 2026, the Maryland State Board of Pharmacy (the "Board") charged **BOOTHWYN PHARMACY** (the "Respondent"), Permit Number **P05923**, under the Maryland Pharmacy Act (the "Act"), Md. Code Ann., Health Occupations §§ 12-101 *et seq.* (2021 Repl. Vol. & 2025 Supp.).

Specifically, the Board charged the Respondent with violating the following provisions of the Act:

> **Health Occ. § 12-409. Pharmacy permits – Suspensions and revocations – Grounds.**
>
> (a) Subject to the hearing provisions of § 12-411 of this subtitle, the Board may suspend or revoke any pharmacy permit, if the pharmacy:
>
> (2) Violates any of the standards specified in § 12-403 of this subtitle; or
>
> (3) Otherwise is not conducted in accordance with the law.
>
> (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. § 12-403. Pharmacy permits – Required standards.

(c) Except as otherwise provided in this section, a pharmacy for which a pharmacy permit has been issued under this title:

(9) May not participate in any activity that is a ground for Board action against a licensed pharmacist under § 12-313 of this title, a registered pharmacy technician under § 12-6B-09 of this title, or a registered pharmacy intern under § 12-6D-11 of this title[.]

(g) Notwithstanding subsection (b) of this section, a nonresident pharmacy shall:

(1) Comply with the requirements of subsection (c)(2), (7) through (12), and (19) of this section when:

(i) Dispensing prescription drugs or prescription devices to a patient in this State; or

(ii) Otherwise engaging in the practice of pharmacy in this State;

Health Occ. § 12-313. Licensing – Denials, reprimands, suspensions, and revocations – Grounds.

(b) Subject to the hearing provisions of § 12-315 of this subtitle, the Board, on the affirmative vote of a majority of its members then serving, may . . . reprimand any licensee, place any licensee on probation, or suspend or revoke a license of a pharmacist if the . . . licensee:

(24) Is disciplined by a licensing or disciplinary authority of any state or country or convicted or disciplined by a court of any state or country for an act that would be grounds for disciplinary action under the Board's disciplinary statutes[.]

Pursuant to Health Occ § 12-313(24), the conduct for which the Respondent was disciplined in another jurisdiction would be grounds for disciplinary action under this Board's disciplinary statutes, including under:

Health Occ. § 12-313(b):

(25) Violates any rule or regulation adopted by the Board;

To Wit:

COMAR 10.34.37 Pharmacy Permit Holder Requirements – Wholesale Distribution and Nonresident Pharmacy Operations

.04 Requirements for Nonresident Pharmacy Operations.

B. A nonresident pharmacy shall:

(1) Hold a pharmacy permit issued by the Board; [and]

(13) Maintain at all times a valid, unexpired permit to conduct a pharmacy in compliance with the laws of the state in which it is located[.]

COMAR 10.34.30 Change to Permit – Pharmacy or Wholesale Distribution Permit Holder

.04 Applications for Pharmacy or Wholesale Distributor Establishment Change of Location

A. Permits issued to operate a pharmacy or engage in wholesale distribution, whether located in the State or outside the State, are:

(1) Not transferable; and

(2) Specific to the establishment location that has undergone an opening inspection by the Board.

B. A pharmacy or wholesale distributor that intends to change its establishment location shall:

(1) Submit an application to the Board on a form required by the Board; [and]

(3) If located outside the State, submit an inspection report for the new location conducted by the authorized entity in the state in which the establishment is located, or provide documentation of supplemental accreditation, if applicable.

.05 Change of Information Provided in Applications

Notwithstanding any other reporting requirements, a permit holder shall provide written notification to the Board at least 30 days prior to

any change in information in its application provided to the Board, to include:

B. Change in the physical structure of the establishment, to include any:

(1) Deviation from the floorplan submitted by the permit holder as part of the application; or

(2) Other change that may affect the security or storage conditions of prescription drugs or devices.

On June 10, 2026, a virtual Case Resolution Conference ("CRC") was held before a committee of Board members to determine whether it would be possible to resolve the pending charges with a consent order in lieu of a contested evidentiary hearing. Thereafter, the Respondent agreed to the resolution of this matter by way of public consent order consisting of the Findings of Fact, Conclusions of Law, and Order terms and conditions contained herein.

FINDINGS OF FACT

1. The Respondent is a compounding pharmacy located in Kennett Square, Pennsylvania that operates under Pennsylvania pharmacy permit number PP410228L.

2. Since February 5, 2012, the Respondent has held a nonresident pharmacy permit in the State of Maryland, permit number P05923. At the time that charges were issued in this matter, the Respondent's Maryland permit was active with an expiration date of May 31, 2026, subject to renewal.

3. On or about September 25, 2025, the Respondent provided the Board with a copy of an August 26, 2025 Order in which the Pennsylvania Board of Pharmacy (the

"Pennsylvania Board") took disciplinary action against the Respondent's Pennsylvania pharmacy permit based on the Respondent compounding medications (including GLP-1 medications) in uninspected rooms that were neither included in the Respondent's permit nor disclosed to inspectors, and then transporting the compounded medications to an unpermitted building for processing, packaging, and shipping.

4. More specifically, in the Order entered on August 26, 2025 (the "2025 Pennsylvania Board Order") in *Commonwealth of Pennsylvania Bureau of Professional and Occupational Affairs vs. Boothwyn Pharmacy*, case number 24-54-005908, the Pennsylvania Board placed the Respondent's Pennsylvania permit on indefinite probation and ordered the Respondent to pay a civil penalty of $1,000,000 for violating:

a. "Section 4(a)(6)(h) of the [Pennsylvania Pharmacy] Act, 63 P.S. § 390-4(a)(6)(h), by operating or advertising a pharmacy without being granted a pharmacy permit by the board. Specifically, the Respondent was operating as a pharmacy in Building 221B without having a permit issued by the board;" and

b. "Section 5(a)(6) of the [Pennsylvania Pharmacy] Act, 63 P.S. § 390-5(a)(6) by and through a violation of a board regulation at 49 Pa. Code §27.16(a)(2)(ii), by failing to submit an application to the Board within 30 days before beginning alterations to the pharmacy. Specifically, the Respondent converted rooms, PS112A and PS112B into a compounding area without submitting the plans to the Board for approval prior to starting compounding of medication."

5. As part of the Consent Agreement which the 2025 Pennsylvania Board Order is based on, the Respondent stipulated to and admitted to, *inter alia*, the following:

a. The Respondent's physical plant in Kennett Square, Pennsylvania consists of two separate buildings: 221A and 221B.

b. "Building 221A contains the Respondent's licensed pharmacy, which consists of production and/or compounding rooms."

c. "Building 221B was never inspected and did not receive approval for licensure by the Board."

d. While some rooms located inside of Building 221A were inspected and approved for compounding by Pharmacy Board Inspectors, Rooms PS112A and PS112B in Building 221A "were not inspected and did not receive approval for compounding by the Pharmacy Board Inspectors."

e. "On or about September 3, 2024, Respondent started compounding GLP-1 medications."

f. "Respondent's staff was compounding GLP-1 medications in Rooms PS112A and PS112B at a minimum of five (5) days per week and producing over one thousand (1000) doses each day."

g. "Respondent produced compounded GLP-1 medications in Building 221A and then transferred the medications to Building 221B for storage and shipping."

h. "The compounded GLP-1 medications would be inspected, verified, and packaged by a pharmacist in Building 221B."

i. "Companion drugs were being filled, verified, labeled, and shipped in Building 221B to accompany the GLP-1 shipments."

j. Building 221A "was subjected to Directed and Non-Directed inspections" on November 12, 2024; January 13, 2025; January 28, 2025; and March 11, 2025. The Respondent "did not disclose the compounding that was occurring in Rooms PS112A and PS112B" during any of the inspections.

k. "At no time was Building 221B issued a pharmacy permit by the Board or included in Respondent's licensed pharmacy operations."

6. The Respondent did not notify the Maryland Board regarding its use of the unpermitted building or the new compounding rooms.

7. Documentation from the Respondent shows that the Respondent dispensed approximately 1,580 compounded sterile preparations of GLP-1 medications into Maryland in 2024.

8. The Respondent also shipped several units of compounded GLP-1 medications into Maryland in March 2025, as evidenced by the Respondent's July 24, 2025 email in which the Respondent notified the Board that some of its compounded products were being recalled after an investigation revealed that they failed to meet potency specifications.

9. Since entering into the consent agreement with the Pennsylvania Board of Pharmacy in 2025, the Respondent has implemented corrective actions, made operational and personnel changes, and passed Pennsylvania Board of Pharmacy re-inspections.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact, the Board concludes as a matter of law that the Respondent is subject to disciplinary action in accordance with Md. Code Ann., Health Occ. §§ 12-409, 12-403(c)(9) and (g), and 12-313(b)(24).

ORDER

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

ORDERED that the nonresident pharmacy permit held by **BOOTHWYN PHARMACY**, permit number P05923, is **REPRIMANDED**; and it is further

ORDERED that Boothwyn Pharmacy shall pay a monetary fine in the amount of **EIGHT THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS ($8,750)**, payable to the Maryland State Board of Pharmacy, within six (6) months of the date of this Order, mailed to:

Wells Fargo Bank
Attn: State of MD – Board of Pharmacy
Lockbox 2051
401 Market Street
Philadelphia, PA 19106

NOTE: Please reference "Case Number 25-422B – Boothwyn Pharmacy" on your check or money order to ensure proper assignment to this case; and it is further

ORDERED that Boothwyn Pharmacy shall fully comply with the terms and conditions of the Pennsylvania Board of Pharmacy Order in case number 25-54-005908 dated August 26, 2025; and it is further

ORDERED that Boothwyn Pharmacy shall immediately notify the Board in writing in the event that the Pennsylvania Board of Pharmacy alleges that Boothwyn Pharmacy violated the terms and conditions of the August 26, 2025 Pennsylvania Board of Pharmacy Order; and it is further

ORDERED that, while the Board reserves the right to pursue disciplinary action against Boothwyn Pharmacy for violations of the August 26, 2025 Pennsylvania Board of Pharmacy Order, the Board will not take additional disciplinary action against Boothwyn Pharmacy on the basis of another state pharmacy board taking disciplinary action against Boothwyn Pharmacy solely on the basis of the Pennsylvania Board taking disciplinary action against Boothwyn Pharmacy in the August 26, 2025 Order; and it is further

ORDERED that Boothwyn Pharmacy shall immediately forward copies of any and all reports of inspections conducted during the period of probation imposed by the August 26, 2025 Pennsylvania Board of Pharmacy Order, including, but not limited to, inspections

conducted by the Pennsylvania Board of Pharmacy, the National Association of Boards of Pharmacy, and the United States Food and Drug Administration;

ORDERED that Boothwyn Pharmacy shall comply with all laws and regulations governing the dispensing of prescription drugs and devices, including compounded products, into the State of Maryland by nonresident pharmacies; and it is further

ORDERED that Boothwyn Pharmacy shall bear the cost(s) of complying with this Order; and it is further

ORDERED that Boothwyn Pharmacy 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 failure to fully comply with the terms and conditions of this Order, including failure to pay the monetary fine in full by the deadline, constitutes a violation of this Order; and it is further

ORDERED that, if the Board, after providing notice and an opportunity for a show cause hearing, determines that Boothwyn Pharmacy violated this Order, the Board, in its discretion, may impose any appropriate sanction under the Act; and it is further

ORDERED that this Consent Order is a Final Order of the Maryland State Board of Pharmacy and, as such, is a **PUBLIC RECORD** pursuant to Md. Code Ann., Gen. Prov. §§ 4-101 et seq.

1-7-26
Date

Akash Patel, Pharm.D., President,
Maryland State Board of Pharmacy

CONSENT

I, Adonis Ducre, Boothwyn Pharmacy Vice President of Regulatory and Compliance, acknowledge that I have had the opportunity to consult with legal counsel before signing this document. By this Consent, I accept, on behalf of Boothwyn Pharmacy, to be bound by this Consent Order and its conditions and restrictions. On its behalf, I waive any rights Boothwyn Pharmacy 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 Boothwyn Pharmacy 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 Boothwyn Pharmacy'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 Boothwyn Pharmacy and understand its meaning and effect.

6/29/26
Date

Adonis Ducre, Boothwyn Pharmacy
Vice President of Regulatory and Compliance

STATE OF MARYLAND (Texas)
CITY/COUNTY OF Harris

I HEREBY CERTIFY that on this 29th day of June, 2026, before me, a Notary Public of the State of Maryland and City/County aforesaid, personally appeared Adonis Ducre, and made an oath in due form of law that the foregoing Consent was his voluntary act and deed.

AS WITNESS, my hand and Notary Seal.

WILLENA DUCRE
Notary ID #134324989
My Commission Expires
April 26, 2027

Willena Ducre
Notary Public
My Commission Expires: 4/26/2027