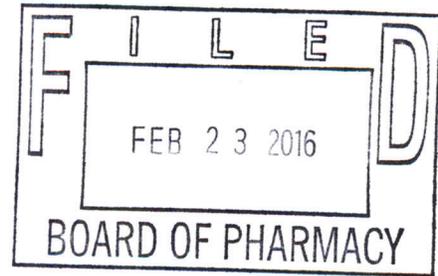


JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
Division of Law, 5<sup>th</sup> Floor  
124 Halsey Street  
P.O. Box 45029  
Newark, New Jersey 07101



By: Megan Cordoma  
Deputy Attorney General  
(973) 648-4730

STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF PHARMACY

IN THE MATTER OF THE :  
PERMIT OF :  
: **Administrative Action**  
: **INTERIM CONSENT ORDER**  
**Best Health Care Services, Inc.** :  
**PERMIT #28RS00480100** :  
: **TO OPERATE AS A PHARMACY** :  
**IN THE STATE OF NEW JERSEY** :

This matter was opened to the New Jersey State Board of Pharmacy (the "Board") upon the receipt of an inspection report of Best Healthcare Services Pharmacy ("Respondent"), located at 830 Broadway, Norwood, New Jersey 08648. The report was dated April 14, 2015 and documents a number of violations related to the Board's regulations regarding sterile compounding as well as the requirements set forth in Chapter <797> of the United States Pharmacopeial Convention ("USP"). These violations include concerns in the areas of environmental monitoring and documentation, cleaning and disinfecting, training and garbing, compounding policies and procedures, and quality of active pharmaceutical ingredients (API). Of particular note, when test results indicate that the cleanroom or any primary engineering

controls do not meet the standards established, the pharmacy failed to immediately cease using the cleanroom or primary engineering controls that were out of compliance until such time that the cleanroom and/or the primary engineering controls met the requisite standards.

By Consent Order filed on January 21, 2016, Respondent agreed to cease and desist sterile compounding pending an evaluation by a third-party monitor and subsequent inspection by the Board. By letter dated January 25, 2016, LDT Health Solutions, Inc. indicated that they had completed a comprehensive evaluation of Respondent and opined that, if Respondent continues to follow their policies & procedures, and document their activities as outlined therein, the pharmacy presents no unreasonable risk to the public health. The cleanroom was recertified on January 20, 2016. The Board completed its re-inspection of the facility on February 8, 2016, which appears to meet all required standards at this time.

The parties, having agreed to entry of this Interim Order, without further formal proceedings, and Respondent, having agreed and given voluntary consent to the within Order and waiving any right to a hearing, and the Board finding the within disposition adequately protective of the public health, safety and welfare, and other good cause having been shown;

**IT IS, therefore, on this 23<sup>rd</sup> day of February, 2015**

**ORDERED THAT:**

1. Respondent may resume sterile compounding upon the filing of this Order, subject to the conditions in this Order.
2. Respondent shall submit their plan of corrective action and all changes made to their policies and procedures within 30 days of the date this Order is filed.

3. Respondent shall contract with a third party Monitor pre-approved by the Board to review all compounding operations of the pharmacy on at least three occasions before April 1, 2017 to ensure the pharmacy continues to be in compliance with the requirements of USP and the regulations of the Board. For the purposes of this Order, LDT Health Solutions, Inc. is an approved monitor. The Monitor shall evaluate Respondent at unannounced visits at intervals of approximately 4 months and shall provide comprehensive reports to the Board within two weeks of each evaluation.

4. Respondent shall conduct monthly environmental testing up to and including March 2017. In the event that test results indicate that the cleanroom or any primary engineering controls do not meet established standards, Respondent shall immediately cease using the cleanroom or primary engineering controls that were out of compliance and advise the Board within 24 hours of the receiving the test results. Respondent shall not resume sterile compounding until such time that the cleanroom and/or the primary engineering controls have been appropriately retested and shown to meet the established standards. Respondent shall submit to the Board documentation showing that appropriate testing has been completed and that a root cause analysis has been conducted to determine what cause the abnormal value/deviation from the standard prior to resuming sterile compounding.

5. All costs associated with compliance with this Order shall be the responsibility of, and paid directly by, Respondent.

6. This Consent Order shall not be construed to be a disciplinary action or sanction of any kind, nor as an admission of liability on the part of the pharmacy.

7. The entry of within Order is without prejudice to the further investigation and/or prosecution by the Board, the Attorney General, or any other regulatory or law enforcement agency of any violations by Respondent of any statutes or regulations governing the practice of pharmacy in the State of New Jersey or any violations of law, including but not limited to any pending matters under investigation.

NEW JERSEY STATE BOARD OF PHARMACY

By: Thomas F.X. Bender, Jr. RPh  
Thomas F.X. Bender, R.Ph.,  
President

I have read the within Order and understand it. I agree to be bound by its terms and hereby consent to it being entered by the New Jersey Board of Pharmacy.

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Daniel Greenleaf, CEO  
On behalf of and authorized by  
Best Healthcare Services, Inc.  
to enter into this Order

Consent as to form and entry:

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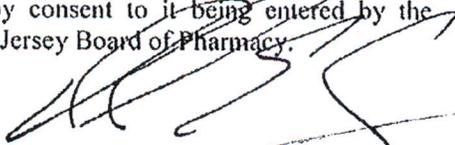
John Ridgway, Esq.  
Attorney for Respondent

7. The entry of within Order is without prejudice to the further investigation and/or prosecution by the Board, the Attorney General, or any other regulatory or law enforcement agency of any violations by Respondent of any statutes or regulations governing the practice of pharmacy in the State of New Jersey or any violations of law, including but not limited to any pending matters under investigation.

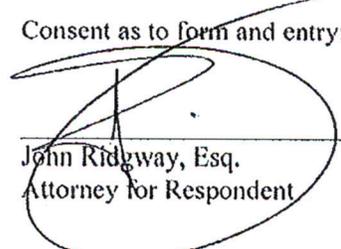
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On behalf of and authorized by  
Best Healthcare Services, Inc.  
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Consent as to form and entry:

  
\_\_\_\_\_  
John Ridgway, Esq.  
Attorney for Respondent