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June 18, 2007

Mr. Ed Feliciano
PBM Network, LLC
846 Lincoln Road 4th Floor
Miami, Florida 33139

VIA CERTIFIED MAIL

Re: PBM Network

CEASE AND DESIST

Dear Mr. Feliciano:

An investigation by the North Carolina Board of Pharmacy has established that PBM Network, LLC, of which you are listed as a Pharmacy Account Manager, is soliciting pharmacies in North Carolina to act as fulfillment centers.

The solicitation materials, copies of which we have obtained, along with information gained through our investigative staff, indicate that your company runs "telephone clinics". Those materials and information state that you use "a doctor that is in North Carolina," whom you have identified as [REDACTED]. Your solicitation materials also advertise the availability of controlled substances whose use without appropriate medical oversight is an immediate and serious threat to the public health and safety.

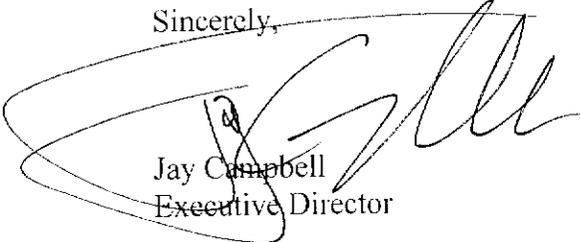
Frankly, it is difficult to overstate the illegal nature of your business. North Carolina law specifically prohibits pharmacists from filling any prescription that they know, or reasonably should know, was issued without a physical examination and in the absence of a prior prescriber-patient relationship. 21 N.C.A.C. 46.1801. Moreover, issuing prescriptions for controlled substances in the manner stated in your materials violates both the federal and state controlled substances acts. Our Board, with cooperation with other state and federal law enforcement, has been active in shutting down illegal businesses such as yours. And we are prepared to do the same in your case.

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By copy of this letter, I am alerting the federal Drug Enforcement Administration, North Carolina Attorney General's office, and the North Carolina Medical Board of the nature of your business.

Accordingly, you are ordered to **IMMEDIATELY CEASE AND DESIST** any further solicitation of North Carolina pharmacies in violation of state and federal law. Failure to abide by this order will result in the Board taking all available legal options. Please give this order your immediate, most serious attention.

Sincerely,



Jay Campbell
Executive Director

cc: Brian Reise, Drug Enforcement Administration
Creecy Johnson, North Carolina Attorney General's Office
David Henderson, Executive Director, North Carolina Medical Board
Curt Ellis, Director of Investigations, North Carolina Medical Board
Clint Pinyan, Esq., Brooks, Pierce, McLendon, Humphrey, & Leonard, L.L.P.