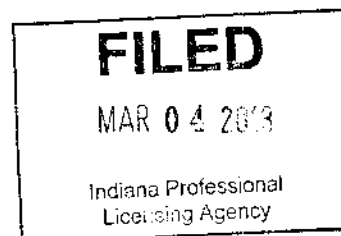


**BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0024**

**IN THE MATTER OF THE INDIANA)
NON-RESIDENT PHARMACY LICENSE OF)
ANEWrx)
LICENSE NUMBER 64001058A (ACTIVE))**



COMPLAINT

This complaint is brought against the non-resident pharmacy license of ANEWrx (Respondent), by the Office of the Attorney General, by counsel, Deputy Attorney General Darren R. Covington, on behalf of the State of Indiana (Petitioner) and pursuant to Ind. Code § 25-1-7-7, Ind. Code § 25-1-5-3, Ind. Code ch. 25-26-13, the Administrative Orders and Procedures Act, Ind. Code art. 4-21.5 and Ind. Code ch. 25-1-9 and in support alleges and states:

FACTS

1. Respondent's address on file with the Indiana Professional Licensing Agency is 523 Parkway View Drive, Pittsburgh, Pennsylvania, 15205.
2. Respondent is a licensed non-resident pharmacy in the State of Indiana having been issued license number 64001058A on March 9, 2010.
3. At all times relevant herein, William Sadowski was the Chief Executive Officer and co-owner of Respondent.
4. Respondent is engaged in the business of distributing anabolic steroids and human growth hormones (HGH).
5. Pursuant to Title 21 of the United States Code, Sections 841(a)(1) and 846, HGHs are not permitted for anti-aging, body building or athletic performance enhancement purposes.

6. Respondent, through Sadowski, engaged in an illegal scheme with a local Pennsylvania physician to prescribe and dispense anabolic steroid and HGH cocktails for unauthorized uses.

7. Sadowski inflated the price of these cocktails for the physician's patients, and gave the price difference to the physician as a kickback. In addition to other compensation, the physician received over \$493,000 in salary from Respondent.

8. Respondent also had business relationships with three clinics in Florida to fill prescriptions for anabolic steroids and HGHs, even though Respondent had affirmative knowledge that the physicians at these clinics were not examining the patients.

9. Furthermore, Respondent had a buy/sell agreement with Applied Pharmacy in Mobile, Alabama and a pharmacist employed there. After the pharmacist was indicted for illegal steroid distribution, the pharmacist referred approximately twenty physicians to Respondent to have their prescriptions for anabolic steroids and HGHs filled. Respondent paid this pharmacist a commission for each referral received.

10. On or around October 16, 2012, Sadowski was indicted in United States District Court, Western District of Pennsylvania, with one count of Conspiracy to Distribute Controlled Substances – Anabolic Steroids.

11. On or around November 5, 2012, Sadowski pled guilty to one count of Conspiracy to Distribute Controlled Substances – Anabolic Steroids.

12. As of February 21, 2013, a sentencing order had not been issued.

COUNT I

13. Paragraphs 1 through 12 are incorporated by reference herein.

14. Respondent violated Ind. Code § 25-1-9-4(a)(3) in that Respondent has knowingly violated Title 21, United States Code, Sections 841(a)(1) and 846 as evidenced by the fact that Respondent engaged in a scheme to inappropriately distribute anabolic steroids and HGHs.


WHEREFORE, Petitioner demands an order against the Respondent that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all costs incurred in the prosecution of this case; and,
3. Provides any further relief as the Board deems just and proper.

Respectfully submitted,

Gregory F. Zoeller
Attorney General of Indiana
Atty. No. 1958-98

By:


Darren R. Covington
Deputy Attorney General
Attorney No. 28511-16

CERTIFICATE OF SERVICE

I certify that a copy of the "Complaint" has been duly served upon the Respondent, by United States mail, first-class, postage prepaid, on this 4th day of March, 2013.

ANEWrx
523 Parkway View Dr.
Pittsburgh, PA 15205

By: DRS
Darren R. Covington
Deputy Attorney General
Attorney No. 28511-16

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