

**SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF PHARMACY**

In re: Echo Health, LLC

Vermont License No. n/a

}
}
}

Docket No. 2025-87

Appearances:

Prosecutor: George Hasselback, Esq.

Respondent: Did not appear

Hearing Officer: Maxine Jo Grad

DEFAULT ORDER

Findings of Fact

1. The Respondent Echo Health LLC of Mansfield, TX, at all times relevant to this matter, was not licensed by the State of Vermont to practice pharmacy.
2. The Hearing Officer held a hearing in the above matter on September 29, 2025, pursuant to 3 VSA Sec. 129(f). The hearing was held electronically pursuant to the Notice of Hearing. The State requested a Default because the Respondent had not responded to the charges in this case. A Notice of Default Hearing was sent to the Respondent's last known address, which is the address on file with the Office of Professional Regulation, on or about July 21, 2025, by first class mail and by certified mail. The first-class mail notice was not returned. The certified mail return receipt was received by the Office of Professional Regulation on August 21, 2025. According to testimony of OPR Docket Clerk, an annotation "vacant" was made on the certified mail receipt.
3. Specification of Charges were filed in this case on or about May 29, 2025. A copy of the Specification of Charges is attached to this order. The charges were sent to the Respondent's last known address, which is the address on file with the Office of Professional Regulation on May 29, 2025, by certified mail and first-class mail. Neither the certified mail nor first class mail notices were returned.
4. No Answer has been filed.
5. Under the Administrative Rules of the Office of Professional Regulation, Rule 3.4, a default may be entered when an Answer is not filed within the required time period.
6. Upon consideration of the Prosecution's presentation and taking notice of the OPR file, the Hearing Officer of the Board finds Respondent to be in Default. The allegations contained in the Specification of Charges are therefore treated as the facts on which the Board may issue an order of professional discipline. OPR Rule 3.4, 3 V.S.A. § 809(d), and 3 V.S.A. § 814(c).
7. As indicated by the Board's file and the Prosecution's presentation, because Respondent has failed to answer the charges, the factual allegations in the Specification of Charges are treated as if proved. O.P.R. Rule 3.4. Accordingly, the Board may find, based up the finding of Default from this Default Hearing held

pursuant to 3 V.S.A. §809(d), that Respondent has engaged in the unprofessional conduct alleged in the Specification of Charges. **The Respondent committed unprofessional conduct by violating: 26 V.S.A. §204(a)(1) by practicing pharmacy without a license within the State of Vermont and 3 V.S.A. § 127(b)(2)(A) unauthorized practice.**

8. It was the State's recommendation that Respondent pay a monetary civil penalty pursuant to 3 V.S.A. § 127(b)(2)(A) for practicing the regulated profession of Pharmacy without a license within the State of Vermont. The State recommends that Respondent shall pay a monetary civil penalty in the amount of \$2,500.00 (twenty-five hundred) for each of the seven (7) instances between November 2, 2023 and January 13, 2024 when it compounded pharmaceutical products intended for human use at its facility in Texas and sent those products to individuals in Vermont without a valid 503B Outsourcer license, for a total of \$17,500 (seventeen thousand five hundred).

Proposed Order

In accordance with the above Findings of Fact and Conclusions of Law, and consistent with the recommendation by the State, the Board does ORDER that the Respondent pay a civil penalty to OPR in the amount of \$17,500 within Ninety (90) days of the entry of the Board's order.

This Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. §129(a).

The Hearing Officer reports the above findings of facts, conclusions of law, and the Proposed Order to the Board of Pharmacy with the recommendation that the Board approve them and enter the Order as above.

Dated this 3rd day October 2025.

/s/ Maxine Jo Grad

Maxine Jo Grad

Hearing Officer of the Vermont Board of Pharmacy

The Vermont Board of Pharmacy of the Office of Professional Regulation considered the report of findings of fact and conclusions of law on October 22, 2025. After considering the report, the Hearing Authority takes the following action:

- / / Rejects the report and schedules the matter for hearing.
- / / Schedules the matter for additional evidence.
- / X / Accepts the report, adopts the findings of fact and conclusions of law, and orders the recommended discipline as set forth in the proposed order above.

SO ORDERED.

Vermont Board of Pharmacy of the Office of Professional Regulation

Signed by:
By: Savannah Cheeseman
824472E7C50D48F...

Date: 10/22/2025, 2025

Vermont Board of Pharmacy

OFFICE OF PROFESSIONAL REGULATION

DATE OF ENTRY: 10/22/25

APPEAL RIGHTS

This is a final administrative determination by the Vermont Board of Pharmacy of the Office of Professional Regulation. A party aggrieved by a final decision of a board or hearing authority may appeal this decision by filing a written Notice of Appeal with the Director of the Office of Professional Regulation, Vermont Secretary of State, 89 Main Street, Fl. 3, Montpelier, VT 05620-3402 within 30 days of the entry of this order. If an appeal is filed, the Director of the Office of Professional Regulation shall assign the case to an appellate officer. The review shall be conducted on the basis of the record created before the board. In cases of alleged irregularities in procedure before the board, not shown in the record, proof on that issue may be taken by the appellate officer. 3 V.S.A. §§ 129(d) and 130a.

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF PHARMACY**

IN RE:)
Echo Health LLC) **Docket Nos. 2025-87**

MOTION FOR DEFAULT

NOW COMES the State of Vermont, by and through Prosecuting Attorney George Hasselback, and pursuant to Rule 3.3 of the Administrative Rules of Practice for the Office of Professional Regulation (“ARPOPR”), hereby moves that the Board of Pharmacy (the “Board”) find Respondent Echo Health LLC (“Respondent”) in default for the reasons stated in the following Memorandum of Law.

MEMORANDUM OF LAW

Rule 3.3 of ARPOPR requires a respondent to file an answer to a specification of charges “within 20 days of the date on which the notice of charges was mailed by the Director.” Under the Rules, if a respondent fails to file a timely answer, a default hearing shall be conducted. ARPOPR 3.4. At the default hearing, “the allegations of the charges will be treated as proven and disciplinary action will be taken.” *Id.*

In this matter, Respondent has failed to file a response to the charges and is, therefore, in default. The State filed the Specification of Charges against Respondent on May 29, 2025. Respondent was notified of the charges by letter from the Docket Clerk of the Office of Professional Regulation, sent by both certified and first class mail, on May 29, 2025. *See* ARPOPR 3.2. Respondent’s answer was due on or before June 18, 2025. *See* ARPOPR 3.4. As of this date, Respondent has failed to submit an answer.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional
Regulation 89 Main
Street
3rd Floor
Montpelier.

WHEREFORE, in accordance with ARPOPR 3.3, et seq., the State respectfully requests that the Board schedule a default hearing and find Respondent in default.

DATED at Montpelier, Vermont this 21st day of July 2025

STATE OF VERMONT
SECRETARY OF STATE

By: George Hasselback
George L. Hasselback
Prosecuting Attorney
George.hasselback@vermont.gov

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional
Regulation 89 Main
Street
3rd Floor
Montpelier,

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF PHARMACY**

IN RE:	)	
Echo Health , LLC	)	Docket No. 2025-87
License No. n/a	)	
	)	

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and makes the following charges against Respondent Echo Health, LLC:

Board Authority

1. The Vermont Board of Pharmacy (“the Board”) has authority to issue warnings or reprimands; suspend, revoke, limit, or condition licenses and registrations; or prevent the renewal of licenses and registrations, and to deny licensure or registrations if, after a disciplinary hearing, the Board finds that the Respondent engaged in unprofessional conduct. 3 V.S.A. §§ 129, 129a; 26 V.S.A. Chapter 36; the Administrative Rules of the Vermont Board of Pharmacy (“BOP Rules”); and the Administrative Rules of the Office of Professional Regulation (“AROPR”).

Statement of Facts

2. Echo Health, LLC (“Respondent”) of Mansfield, TX, was, at all times relevant to this matter, not licensed to practice pharmacy by the State of Vermont.
3. At all times relevant to this matter, Respondent was operating as a 503B Outsourcer, compounding pharmaceutical products at its facility in Texas and distributing them to individuals in other States, including Vermont.
4. On or between November 2, 2023, and January 13, 2024, Respondent sent compounded products intended for human use that it had prepared to individuals in the State of Vermont approximately seven (7) times.
5. By doing so, Respondent practiced pharmacy as a 503B Outsourcer without a valid license.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

Violation One: 3 V.S.A. §127(b)(2)(A): The Attorney General or an attorney assigned by the Office of Professional Regulation may elect to bring an action seeking only a civil penalty of not more than \$2,500.00 for practicing or permitting the practice of a regulated profession without authority before the board having regulatory authority over the profession or before an administrative law officer.

6. The State re-alleges and incorporates Paragraphs 2 through 5 above.
7. A person or entity may only practice pharmacy within the State of Vermont if that person is licensed by the State of Vermont (26 V.S.A. § 2041(a)).
8. Under 26 V.S.A. § 2022(15)(A)(ii), "practice of pharmacy" is defined (among other ways) as "compounding [and] dispensing...drugs."
9. Paragraphs 2 through 5 above demonstrate that Respondent practiced pharmacy without a license when it compounded pharmaceutical products intended for human use and distributed them to people within the State of Vermont without a valid 503B Outsourcer license.
10. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for a civil penalty because Respondent has committed unauthorized practice in violation of 3 V.S.A. §127(b)(2)(A).

Relief Requested

WHEREFORE, The State of Vermont respectfully requests that Respondent be assessed a monetary civil penalty pursuant to 3 V.S.A. § 127(b)(2)(A).

DATED at Vermont, this 29th day of May 2025.

STATE OF VERMONT
SECRETARY OF STATE

By: George Hasselback
George Lloyd Hasselback
Prosecuting Attorney
(802) 828-0350
george.hasselback@vermont.gov

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402