From: Horne, Christine
To: Horne, Christine
Subject: RE: Counterfeit discovery reporting
Date: Tuesday, October 11, 2022 4:20:10 PM
Attachments: image001.png
image002.png

From: Michael Crow, Esq. <michael.crow@pharma.solutions>
Sent: Thursday, September 29, 2022 9:12 AM
To: OPLC: Customer Support <customersupport@oplc.nh.gov>
Subject: Counterfeit discovery reporting

Hello Regulators:

I have reviewed the New Hampshire regulations and statutes. I have also reviewed your agency website in attempt to determine what notification steps, if any, must be taken by Distributors or Manufacturers who discover counterfeit product in their possession. Some states defer to the Federal procedure. Some states require their licensees to report directly to them.

Can you advise what is the proper procedure in your jurisdiction? Is reporting to the FDA proper, or must the State Board of Pharmacy also be advised in all cases?

Is this applicable for all products: Prescription/Legend, Controlled Substance, and Over the Counter? Also, do these requirements apply only to product likely to enter New Hampshire? Or if a New Hampshire licensee discovers product anywhere in their commerce stream?

Any guidance or help you can offer would be appreciated.
My thanks in advance.

Sincerely,

Michael Crow

Michael Crow, Esq.
Compliance Attorney
Email: michael.crow@pharma.solutions

office: (484) 800-1863 ext 206
direct: (610) 934-2319