

May 23, 2022

Greenwich Biosciences, LLC  
5750 Fleet Street, Suite 200  
Carlsbad CA 92008

RE: Case No. 22-138

To Whom it May Concern:

Enclosed you will find a Summary Order issued by the Kansas Board of Pharmacy (Board) in the above-referenced matter. Please read the order in its entirety. In addition, a civil fine has been assessed totaling \$500. Please submit a check or money order made payable to the Kansas Board of Pharmacy and include your case number in the check memo.

If you disagree with the findings of fact, you have the right to request a hearing. Instructions for filing a written request are included under the "Notices" section of the order. Hearings are held before the full Board during their regularly scheduled quarterly meetings.

According to KSA 65-1627h, the Board is required to recoup the costs of administrative hearings when the decision is adverse to the licensee. These costs may include charges for services rendered by the Board's disciplinary counsel, an administrative law judge, and, if applicable, a court reporter.

If you have any questions, feel free to contact the Board at [Pharmacy.Compliance@ks.gov](mailto:Pharmacy.Compliance@ks.gov).

Sincerely,

Kansas Board of Pharmacy

Enclosure

BEFORE THE KANSAS BOARD OF PHARMACY

In the Matter of )  
 )  
Greenwich Biosciences, LLC )  
 )  
Registration No. 4-117853 )

Case No. 22-138

**SUMMARY ORDER**

NOW on this 23rd day of May, 2022, comes before the Kansas Board of Pharmacy (the “Board”), through its Executive Director, the matter of Greenwich Biosciences, LLC (“Respondent”).

Pursuant to the authority granted to the Board by the Kansas Pharmacy Act, K.S.A. 65-1625, *et seq.*, and in accordance with the Kansas Administrative Procedure Act, K.S.A. 77-501, *et seq.*, the Board’s Executive Secretary enters this Summary Order in the above-captioned matter. After reviewing the investigation materials and being otherwise duly advised in the premises, makes the following findings, conclusions and order:

**FINDINGS OF FACT**

1. The Board has previously issued Respondent Registration No. 4-114538 which entitles Respondent to operate as a non-resident manufacturer in the State of Kansas (“Respondent’s Registration”).
2. On December 31, 2021, the ownership of Respondent’s facility was changed from Greenwich Biosciences, Inc. to Greenwich Biosciences, LLC.
3. On April 29, 2022, the Board received from Respondent a Form BA-04 Manufacturer Registration Application, notifying of the change in ownership from Greenwich

Biosciences, Inc. to Greenwich Biosciences, LLC, effective December 31, 2021, and applying for a new manufacturer registration for the new ownership model.

4. On May 5, 2022, the Board approved Respondent's manufacturer application, effective immediately.

#### CONCLUSIONS OF LAW

1. Pursuant to K.S.A. 65-1658, the Board may assess a civil fine not to exceed \$5,000, after notice and an opportunity to be heard, to any registrant for violation of the pharmacy act of the state of Kansas or any other rules or regulations of the state board of pharmacy.

2. Pursuant to K.S.A. 65-1643, it shall be unlawful for any manufacturer to operate in Kansas without first obtaining a registration as a manufacturer from the Board.

3. Pursuant to K.S.A. 65-1645(f), registrations shall not be transferrable.

4. Pursuant to K.S.A. 65-1643d, the Board shall require an applicant for registration as a manufacturer or virtual manufacturer under K.S.A. 65-1643 to provide the following information: the name, full business address and telephone number of the applicant; the type of ownership or operation of the applicant; the name of the owner or operator of the applicant; and any other information as the board deems appropriate.

5. Respondent's failure to submit the complete change of ownership application to the Board until April 29, 2022 is a violation.

6. Since Respondent utilized the registration issued to the prior owner, Respondent transferred the use of the registration to the new owner.

7. By operating as a manufacturer in the state of Kansas under the old ownership and registration number prior to notifying the Board and filing the requisite ownership change

application and receiving an updated registration, Respondent violated K.S.A. 65-1643, 65-1643d, and 65-1645.

### ORDER

The Board finds and concludes that Respondent's conduct, as described above, violates the Act and such conduct warrants the imposition of a fine pursuant to K.S.A. 65-1658, in the amount of \$500.00. Respondent has 30 days from the date of this order to pay the full \$500.00.

### NOTICES

The Respondent is hereby notified as follows:

1. The Respondent may request a hearing pursuant to the Kansas Administrative Procedure Act by filing a written request with the Kansas Board of Pharmacy, 800 SW Jackson, Suite 1414, Topeka, KS 66612-1231 within fifteen (15) days after service of this order.

2. If a hearing is not requested as described above, the Order shall become a final order of the Board, effective upon the expiration of the time to request a hearing.

3. Within fifteen (15) days after entry of a final agency order, either party may file a petition for reconsideration pursuant to K.S.A. 77-529.

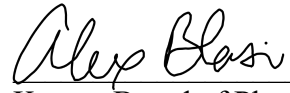
4. Within the time limits established in K.S.A. 77-613, either party may seek judicial review of a final agency order, pursuant to said statute. The agency officer designated to receive service of a petition for judicial review is:

Alexandra Blasi  
Executive Secretary  
Kansas Board of Pharmacy  
800 SW Jackson, Suite 1414  
Topeka, KS 66612

IT IS SO ORDERED.

5/23/2022

Date

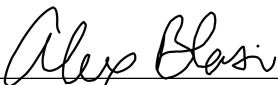


Kansas Board of Pharmacy

CERTIFICATE OF SERVICE

I hereby certify that I did, on the 23rd day of May, 2022 deposit in business mail a copy of the foregoing Summary Order, which is then placed in the United States Mail, postage prepaid, properly addressed to the following:

Greenwich Biosciences LLC  
5750 Fleet Street, Suite 200  
Carlsbad CA 92008

  
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Kansas Board of Pharmacy Staff