	TH AND HUMAN SERVICES G ADMINISTRATION
DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
550 W. Jackson Blvd., Suite 1500	08/12/2015 - 11/19/2015*
Chicago, IL 60661-4716	FEINUMBER
(312) 353-5863 Fax:(312) 596-4187	3011707930
Industry Information: www.fda.gov/oc/indus	stry
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
TO: Inayat (NMI) Patel, Registered Agent	for Wellcare Rx Investments LLC
FIRM NAME	STREET ADDRESS
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave
Specialty Pharmacy	
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Wheaton, IL 60187-5463	Producer of sterile drugs

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

DURING AN INSPECTION OF YOUR FIRM I OBSERVED:

OBSERVATION 1

During a field examination of drug products at your facility the following was observed:

Specifically,

On 8/14/15, I observed a vial of sterile human finished drug product Chlorpromazine HCL 25mg/ml, production lot # 05-070815, prepared on 7/8/15 and expires 10/8/15, with what looked like particles floating in the drug product.

OBSERVATION 2

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile are not established and written.

Specifically,

During the aseptic preparation of sterile Atropine 0.01% Ophthalmic Drops, firm lot # 01-082715, performed on 8/27/15 by a technician in the ISO-5 laminar air flow hood, I observed the following deficiencies in aseptic technique:

- There is no documented decontamination of the ISO-5 laminar air flow hood prior to use. For example, I did not observe the technician wipe down the laminar air flow hood with sterile
 (b) (4) before performing aseptic processing of the sterile drug product.
- 2. Packages containing sterile items necessary for production were not decontaminated/wiped

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	DEPARTMENT OF HEAD		SERVICES	
DISTRICT ADDRESS AND PHON	ENUMBER	IG ADMINISTRATION	DATE(5) OF INSPECTION	
550 W. Jackson Blvd., Suite 1500 Chicago, IL 60661-4716		08/12/2015 - 11/19/	/2015*	
	3 Fax: (312) 596-4187		3011707930	
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TO: Inayat	(NMI) Patel, Registered Agent	for Wellcar	e Rx Investments LL	C
FIRM NAME	nvestments LLC dba Denson's	STREET ADDRESS 200 E Willo	W Avo	
Specialty Pha	rmacy			
Wheaton, IL	RY 60187-5463	TYPE ESTABLISHMENT INS	sterile drugs	
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 down with sterile (b) (4) before placing/introducing them into the ISO-5 laminar air flow hood. For example, on 8/27/15, I observed the following: I observed the technician place the package containing the (b) (4) 1% Atropine (b) (4) 1% (b) (4) (b) (4), expires (b) (4), in the laminar air flow hood. if (b) (4) (b) (4), expires (b) (4), in the laminar air flow hood. Packages containing sterile items necessary for production were opened outside of the laminar air flow hood exposing sterile contents to the non-sterile room air. For example, I observed the following. a) I observed the technician open three sterile wipes outside of the laminar air flow hood on infinite wipes to wipe the injection port of the (b) (4) b) I observed the technician open the wrappers on three sterile syringes outside of the laminar air flow hood and place them in the laminar air flow hood before using them: a sterile (b) (4) syringe with (b) (4), syringe with (b) (4)				
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	DEPARTMENT OF HEA FOOD AND DRU	LTH AND HUMAN S	SERVICES	
DISTRICT ADDRESS AND PHON			DATE(S) OF INSPECTION	
	son Blvd., Suite 1500		08/12/2015 - 11/19	/2015*
	60661-4716 5863 Fax:(312) 596-4187		3011707930	
Industry Info	ormation: www.fda.gov/oc/indu	istry		
NAME AND TITLE OF INDIVIDUA TO: Inavat	(NMI) Patel, Registered Agent	- for Wolldow	a Du Tousshaata II	0
FIRM NAME	(MMI) Fater, Registered Agen	STREET ADDRESS	e KX Investments LL	C
	investments LLC dba Denson's	200 E Willo	w Ave	
Specialty Pha	armacy	TYPE ESTABLISHMENT INS	PECTED	
Wheaton, IL	60187-5463	1 100 100 100 100 100 100 100 100 100 1	sterile drugs	
			1.0	
OBSERVATION	•			
UBSERVATION	3			
Protective apparel	is not worn as necessary to protect drug pr	oducts from conta	mination.	
Specifically,				
The apparel wo	rn by personnel while conducting a	septic processir	ng of sterile human drug	products does
not adequately	protect the drug products as follows	. For example,	on 8/27/15, I observed a	technician
prepare the ster	ile drug product, Atropine 0.01% O	phthalmic Drop	os, firm lot # 01-082715.	prepared on
	pires on 9/27/15 in the ISO-5 lamina			
1. The tech	mician had on a non-sterile gown, r	on-sterile mask	, non-sterile bonnet, and	1 non-sterile
booties.			.,	
2. I observ	ed exposed skin on the face of the t	echnician while	the drug product was b	eing prepared
2. 1000017			and and product that t	enig propuedi
3. The ster	ile gloves were opened outside of the	he ISO-5 lamin	ar air flow bood and the	nut them on
	re the sterile drug product.			I put them on
to propu	te die sterite drug product.			
×				
	AMEN	DMENT 1		
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	TH AND HUMAN SERVICES G ADMINISTRATION
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Chicago, IL 60661-4716	FEINUMBER
(312) 353-5863 Fax: (312) 596-4187	3011707930
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NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
TO: Inayat (NMI) Patel, Registered Agent	for Wellcare Rx Investments LLC
FIRM NAME	STREET ADDRESS
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave
Specialty Pharmacy	
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Wheaton, IL 60187-5463	Producer of sterile drugs

Aseptic processing areas are deficient regarding the system for monitoring environmental conditions.

Specifically,

- The firm has never performed environmental monitoring during the production of sterile human drug products. For example, on 8/27/15 I observed the production of Atropine 0.01% Ophthalmic Drops, firm lot # 01-082715, prepared on 8/27/15 and expires on 9/27/15, in the ISO-5 laminar air flow hood and no environmental monitoring was being performed during production.
- a) The firm has never performed monitoring for viable microbiological contamination in the cleanroom including inside of the laminar air flow hood under static or dynamic conditions.
- b) The firm has never performed non-viable particulates monitoring of the cleanroom including inside of the laminar air flow hood under static or dynamic conditions.
- 2. The firm has never performed personnel monitoring after the production of sterile human drug products. For example, on 8/27/15 I observed the compounding of Atropine 0.01% Ophthalmic Drops firm lot # 01-082715, prepared on 8/27/15 and expires on 9/27/15, in the ISO-5 laminar air flow hood and no personnel monitoring was performed during production.
- 3. There is no designated area, for example, an anteroom, for gowning. Gowning is performed (b) (4)

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DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION			
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Industry Information: www.fda.gov/oc/indu	stry		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED			
TO: Inayat (NMI) Patel, Registered Agent	for Wellcare Rx Investments LLC		
FIRM NAME	STREET ADDRESS		
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave		
Specialty Pharmacy			
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED		
Wheaton, IL 60187-5463	Producer of sterile drugs		

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile do not include validation of the sterilization process.

Specifically,

- The firm has not validated the aseptic processing of sterile drug products by performing media fills. For example, the following drug products have been sterilized by (b) (4) using (b) (4) using and no media fills have been performed.
 - a) Cyclosporine (A) 1 % Ophthalmic, firm lot # 13-071615, prepared 7/16/15 and expires 10/16/15.
 - b) Vancomycin 25 mg/ml Ophthalmic, firm lot # 23-081115, prepared 8/11/15 expires 14 days.
 - c) Chlorpromazine HCL 25 mg/ml Injection, firm lot # 05-070815, prepared 7/8/15 and expires 10/8/15.
- The firm has not conducted smoke studies in the critical areas to demonstrate uni-directional airflow and sweeping action over and away from the product under dynamic conditions.

3. The firm failed to validate the (b) (4) used to sterilize some ophthalmic and intramuscular injectables drug products produced from (b) (4) drug products. In addition, the firm has not established (b) (4) bioburden limits in order to determine if it exceeds the (b) (4)
For example, the following sterile drug products are (b) (4)
sterilized using (b) (4)

- a) Cyclosporine (A) 1 % Ophthalmic, firm lot # 13-071615, prepared 7/16/15 and expires 10/16/15.
- b) Vancomycin 25 mg/ml Ophthalmic, firm lot # 23-081115, prepared 8/11/15 and expires 14 days.
- c) Chlorpromazine HCL 25 mg/ml Injection, firm lot # 05-070815, prepared 7/8/15 and expires

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DEPARTMENT OF HEALTH AND HUMAN SERVICES			
DISTRICT ADDRESS AND PHONE		G ADMINISTRATION	DATE(S) OF INSPECTION
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Industry Info	rmation: www.fda.gov/oc/indu	stry	
	NMI) Patel, Registered Agent	for Wellca	re Rx Investments LLC
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Specialty Pha	rmacy	TYPE ESTABLISHMENT IN	
Wheaton, IL	60187-5463	Producer of	f sterile drugs
10/8/15.			
OBSERVATION	6		
Separate or defined areas to prevent contamination or mix-ups are deficient regarding operations related to aseptic processing of drug products. Specifically,			
opeenieuny,			
The design of the clean room used to produce sterile human drug products is deficient as follows:			
has been the air w	qualified by initial studies and class	ssified for air q	ISO-5 laminar air flow hood is located quality and for the particle content in mentation was not available for review
a) Documentation of an assessment of the air quality and the particle content of the air under as- built static conditions.			
 b) Documentation of an assessment of the air quality and the particle content of the air under dynamic conditions when production of sterile drug products occurs. 			
 There is no ISO classification for the surrounding area outside of the ISO-5 laminar air flow hood. 			
 There is no pressure differential cascade between the cleanroom and the surrounding area outside of the entry door in order to control contamination from entering into the cleanroom where sterile drugs are produced. 			
	to designated area, for example, an is performed (b) (4)	anteroom, for	gowning.
AMENDMENT 1			
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DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION				
DISTRICT ADDRESS AND PHONE			DATE(S) OF INSPECTION 08/12/2015 - 11/19/	2015*
Chicago, IL			FEINUMBER	2015
	3 Fax: (312) 596-4187 rmation: www.fda.gov/oc/indu	strv	3011707930	
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TO: Inayat (NMI) Patel, Registered Agent	STREET ADDRESS	e KX investments LLC	
Wellcare Rx I Specialty Pha	nvestments LLC dba Denson's	200 E Willow	w Ave	
CITY, STATE, ZIP CODE, COUNT	RY	TYPE ESTABLISHMENT INSP		
Wheaton, IL	60187-5463	Producer of	sterile drugs	
OBSERVATION	7			
The batch production each significant step	on and control records are deficient in that p in processing.	they do not includ	e documentation of the accon	nplishment of
Specifically,				
following drug	of sterile drug products does not in ng aseptic (b) (4) of drug products products are (b) (4) using (b) (4) the (b) (4) .			xample, the
 a) Cyclosporine (A) 1 % Ophthalmic, firm lot # 13-071615, prepared 7/16/15 and expires 10/16/15. b) Vancomycin 25 mg/ml Ophthalmic, firm lot # 23-081115, prepared 8/11/15 and expires 14 days. 				
b) Vancomycin	25 mg/ml Ophthalmic, firm lot # 2	3-081115, prepa	ared 8/11/15 and expires	14 days.
c) Chlorpromazine HCL 25 mg/ml Injection, firm lot # 05-070815, prepared 7/8/15 and expires 10/8/15.				
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	AMEN	DMENT 1		
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	ATH AND HUMAN SERVICES G ADMINISTRATION	
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Chicago, IL 60661-4716	FEINUMBER	
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NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED		
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FIRM NAME	STREET ADDRESS	
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave	
Specialty Pharmacy		
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED	
Wheaton, IL 60187-5463	Producer of sterile drugs	

Each batch of drug product purporting to be sterile and pyrogen-free is not laboratory tested to determine conformance to such requirements.

Specifically,

Sterile human drug products have never been tested for sterility and pyrogens.

- Chlorpromazine HCL 25 mg/ml Injection, Rx # ^{(b) (4), (b) (6)} produced 7/8/15, lot 06-070815, expires 10/8/15, was not tested for sterility and pyrogens.
- Atropine 0.01% Ophthalmic Drops, Rx # (b) (4), (b) (6) produced 9/2/15 9/23/15, lot 08-090215 11-092315, expires 10/2/15 11/23/15, was not tested for sterility and pyrogens.
- 3. Edeate Disodium 10% Injection, Rx # ^{(b) (4). (b) (6)} produced 7/6/15, lot 03-070615, expires 8/6/15, was not tested for sterility and pyrogens.

OBSERVATION 9

There is no written testing program designed to assess the stability characteristics of drug products.

Specifically,

The firm does not have documentation of stability testing data to support the expiration dates assigned to the sterile human drug products. For example, the following sterile human drug products have expiration dates that are based on (b) (4) but

the firm has never sent out the finished sterile human drug products to assure the finished drug products meets the specifications for identity, strength, and quality, throughout the assigned expiration date.

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TO: Inayat (NMI) Patel, Registered Agent	for Wellcare Rx Investments LLC
FIRMINAME	STREET ADDRESS
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave
Specialty Pharmacy	
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Wheaton, IL 60187-5463	Producer of sterile drugs
 C-Chlorpromazine HCL 25 mg/ml Injec expires 10/8/15. 	tion, $\operatorname{Rx} \#^{(b) (4), (b) (6)}$ produced 7/8/15, lot 06-070815,

- Atropine 0.01% Ophthalmic Drops, Rx # ^{(b) (4), (b) (6)} produced 9/2/15 9/23/15, Lot 08-090215 11-092315, expires 10/2/15 11/23/15.
- 3. Edeate Disodium 10% Injection, Rx # (b) (4), (b) (6) produced 7/6/15, lot 03-070615, expires 8/6/15.

Testing and release of drug product for distribution do not include appropriate laboratory determination of satisfactory conformance to the identity and strength of each active ingredient prior to release.

Specifically,

The following human drug products have never been tested for potency before release.

- Chlorpromazine HCL 25 mg/ml Injection, Rx # ^{(b) (4), (b) (6)} produced 7/8/15, lot 06-070815, expires 10/8/15, was not tested for potency.
- Atropine 0.01% Ophthalmic Drops, Rx # (b)(4). (b)(6) produced 9/2/15 9/23/15, lot 08-090215 11-092315, expires 10/2/15 11/23/15, was not tested for potency.
- 3. Edeate Disodium 10% Injection, Rx # ^{(b) (4), (b) (6)} produced 7/6/15, lot 03-070615, expires 8/6/15, was not tested for potency.

OBSERVATION 11

Each lot of a component liable to objectionable microbiological contamination is deficiently subjected to microbiological tests before use.

Specifically,

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DISTRICT ADDRESS AND FHOME MAMBER 550 W. Jackson Blvd., Suite 1500	DATE(S) OF INSPECTION 08/12/2015 - 11/19/2015*
Chicago, IL 60661-4716 (312) 353-5863 Fax:(312) 596-4187	FEI NUMBER 3011707930
Industry Information: www.fda.gov/oc/indu	istry
TO: Inayat (NMI) Patel, Registered Agen	t for Wellcare Rx Investments LLC
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave
Specialty Pharmacy CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Wheaton, IL 60187-5463	Producer of sterile drugs
 indicate that they have been tested for pyrogens or components were used to produce sterile human in 1. The Certificate of Analysis for Hydroxyprose, does not list pyrogens or bacterial the following sterile drug products that are a) Hydroxyprogesterone (b) (4) (b) (4) was used to prepare prescription #^{(b) (4)}. (b) (6) (b) (4) was used (b) (4) mg/ml in oil, prescription #^{(b) (4)}. (b) (6) (b) (4) was used (b) (4) mg/ml in jection (intramuscular), prescription #/(b) (4) 	jectable drug products. ogesterone (b) (4) endotoxin test results. This lot was used to produce injected intramuscularly. , was used to make a , prepared on (b) (4), expiration (b) (4). Hydroxyprogesterone Caproate 250 mg/ml in oil, , prepared on 5/6/15, patient expiration 8/1/15.
 The Certificate of Analysis for Papaverine does not list pyrogens or bacterial endotoxi following sterile drug products. 	(b) (4) in test results. This lot was used to compound the
a) Papaverine (b) (4) (b) (4) $axpiration (b) (4)$, was used to prepare Papaverine , prepared on (b) (4) ,
b) (b) (4) (b) (4) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	(4) , prepared
c) $(b) (4)$, expiration $(b) (4)$.	
EMPLOYEE(S) SIGNATURE	DMENT 1
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		TH AND HUMAN SERVICES		
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Chicago, IL	on Blvd., Suite 1500	08/12/2	015 - 11/19,	/2015*
(312) 353-586	53 Fax: (312) 596-4187	3011707	930	
Industry Info	ormation: www.fda.gov/oc/indu	stry		
TO: Inayat	(NMI) Patel, Registered Agent	for Wellcare Rx Inv	vestments LL	C
the second se	investments LLC dba Denson's	200 E Willow Ave		
Specialty Pha	rmacy	TYPE ESTABLISHMENT INSPECTED		
Wheaton, IL	60187-5463	Producer of sterile	drugs	
d) (b) (4) used to p	, was used to prepare Urology Trip l on 8/27/15, expiration 10/27/15. prepare Urology Triple Mix 30-1-10 5/15 8/29/15, expiration 10/27/15.			was
strength, quality or Specifically, The firm has no produce some st	nsils are not cleaned and sanitized at appropriate purity of the drug product. t qualified and validated the (b) (4) , that is used to steriliterile drug products. The firm has n	ze the (b) (4) o evidence that the (b) (4	that are	used to
sterilizes t		used to produce some st		ucts.
OBSERVATION	13			4
	n procedures for production and process c juality, and purity they purport or are repre		the drug product	s have the
Specifically,				
The firm does n	ot have current written procedures	related to the compounding	ng of sterile dr	ug products.
	no written procedure that requires a air flow hood and the clean room w			fection of the
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	3 Fax:(312) 596-4187 rmation: www.fda.gov/oc/indu	stry	3011707930	
	NMI) Patel, Registered Agent		e Rx Investments LL	c
FIRM NAME		STREET ADDRESS		<u> </u>
Specialty Pha	nvestments LLC dba Denson's rmacy	200 E Willow	Ave	
CITY. STATE. ZIP CODE. COUNT Wheaton, IL	RY	TYPE ESTABLISHMENT INSP	ecneo sterile drugs	
C. The writh reviewed and/or ar 1. (a b b c d d e	 The procedure does not state to a air flow hood and the cleaning a documentation of the cleaning a clean room. In the procedure under the section 	Man rocedures are no ten procedures i room and Hood document the clo nd disinfection of on of Cleaning S s used to clean t The laminar air flow rupon entry into nat the same day on of Cleaning S n of this cleaning is cleaning. on of Cleaning S replacement of ment of the (b) (ual are not current and h ot adequate for their inte- nclude the following. Maintenance. eaning and disinfection of the clean room. There of the laminar air flow hoo- tre is no documentation hood and the clean room. . On 8/12/15, I of the cleanroom. It was l by management. Schedule (b) (4) it state g and the procedure does icchedule (b) (4) it state the (b) (4) in the over the laminar hood and the over the laminar	of the laminar e is no bood and the to (b) (4) . Currently d(b) (4) of the m with sterile beserved a ater removed es to (b) (4) s not state that ates to (b) (4) out it does not There is st 5 years and
1,	for certification of the laminar a			
	by management for accuracy.			
2. P	harmacy Environment- Clean Air	Center ISO Clas	s 5 (formerly called Cla	ss 100)
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DISTRICT ADDRESS AND PHON		LTH AND HUMAN JG ADMINISTRATION		
	ENUMBER		DATE(S) OF INSPECTION	10015.
550 W. Jackso Chicago, IL	on Blvd., Suite 1500 60661-4716		08/12/2015 - 11/19, FEI NUMBER	/2015*
(312) 353-586	53 Fax:(312) 596-4187		3011707930	
Industry Info	rmation: www.fda.gov/oc/indu	istry		
	(NMI) Patel, Registered Agent	for Wellca	re Rx Investments LL	С
Wellcare Rx I	investments LLC dba Denson's	200 E Will	ow Ave	
Specialty Pha	armacy RY	TYPE ESTABLISHMENT	NSPECTED	
	60187-5463		f sterile drugs	
c 3. I 7 a t	 air flow hood which is used to p b) The procedure is not current in t disinfect the hood. On 8/27/15, 1 to clean the hood after the prepa c) There is no documentation of th the laminar flow hood. Denson's Compounding Pharmacy I The following sections of this proce a) Environmental Monitoring: Air hood have never been performed b) Sanitizing Agents: The sterile (1) 	hat a (b) (4) I observed ster ration of a ster e (b) (4) clea I.V. Admixture dure have new Sampling and d.	is no l is no l rile (b) (4) rile drug product. aning of the HEPA filter g e QA Procedures: er been performed. Surface Testing for the la is not (b) (4)	
D. The writ reviewed (b) (4) re	 Personnel and Process Validation performed. ten procedures in the Policy and Prediction of the written procedures of the written proviewed July 10, 2012; Adverse (b) ces and Complaints reviewed Augustication of the second complaint	on Using Medi rocedures Man rocedures incl (4) Events (t	a-Fill Testing has never b ual are not current and ha ude the following: Produc	ive not beer ct/Item Rec
D. The writ reviewed (b) (4) re Grievand OBSERVATION Routine calibration designed to assure Specifically, the	 Personnel and Process Validation performed. tten procedures in the Policy and Produces and Proceedings of the written proviewed July 10, 2012; Adverse (b) ces and Complaints reviewed Auguration 14 a, inspection, and checking of electronic exproper performance. e firm does not have documentation of drug products. 	on Using Medi rocedures Man rocedures incl (4) Events (t 1st 4, 2012.	a-Fill Testing has never b ual are not current and ha ude the following: Produc (4) (4) reviewed August 2, 2	n program
D. The writ reviewed (b) (4) re Grievand OBSERVATION Routine calibration designed to assure Specifically, the	 Personnel and Process Validation performed. Iten procedures in the Policy and Produces and Proceedings of the written provide a since 2012. Some of the written provide a si	on Using Medi rocedures Man rocedures incl (4) Events (1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	a-Fill Testing has never b ual are not current and ha ude the following: Produc (4) (4) reviewed August 2, 2	nve not been ct/Item Rec 2012; and
D. The writ reviewed (b) (4) re Grievand OBSERVATION Routine calibration designed to assure Specifically, the	 Personnel and Process Validation performed. Iten procedures in the Policy and Produces and Complexity (b) and Complexity (complexity) and Complexity) and Complexity (complexity) and Complexity) and Complexity (complexity) and Complexity (complexity) and Complexity (complexity) and Complexity) and Complexity (co	on Using Medi rocedures Man rocedures incl (4) Events (1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	a-Fill Testing has never b ual are not current and ha ude the following: Produc (4) (4) reviewed August 2, 2	n program

	DEPARTMENT OF HEAD	LTH AND HUMAN SER	VICES	
DISTRICT ADDRESS AND PHON	e Number	DA	TE(S) OF INSPECTION	
550 W. Jackso Chicago, IL	on Blvd., Suite 1500		8/12/2015 - 11/19, INUMBER	/2015*
	3 Fax: (312) 596-4187	3	011707930	
Industry Info	rmation: www.fda.gov/oc/indu	stry		
	(NMI) Patel, Registered Agent	for Wellcare	Rx Investments LL	с
Wellcare Rx I	nvestments LLC dba Denson's	200 E Willow	Ave	
Specialty Pha	rracy RY	TYPE ESTABLISHMENT INSPECT	TED	
Wheaton, IL	60187-5463	Producer of s	terile drugs	
docu perio	h are used to prepare drug products mentation of periodic calibration by odic calibration by employees work e is no documentation of the calibra	does not have a c y an outside vendo ing at the firm.	or, and there is no doc	re is no sumentation of frigerator
Specifically, Components, bo prepare human s sterile drug prod 1. Hydroxy on (b) (4 a) Activ	not tested for conformity with all appropr oth active ingredients and non-activ sterile drug products. For example, hucts. /progesterone (b) (4)) was made with the following com ve ingredient Hydroxyprogesterone following components. ve ingredient Papaverine (b) (4)	e ingredients, are the following components. (b) (4)	not tested before bein	g used to orepare human ⁴⁾ prepared
		DMENT 1		L DITE MORE
SEE REVERSE OF THIS PAGE	Debra I. Love, Investigator		OfR	DATE ISSUED 01/06/2016
FORM FDA 483 (09/08)	PREVIOUS EDITION OBSOLETE INSP	ECTIONAL OBSERVAT	TIONS	PAGE 14 OF 17 PAGES

	TH AND HUMAN SERVICES G ADMINISTRATION
DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
550 W. Jackson Blvd., Suite 1500	08/12/2015 - 11/19/2015*
Chicago, IL 60661-4716	FEINUMBER
(312) 353-5863 Fax: (312) 596-4187	3011707930
Industry Information: www.fda.gov/oc/indus	stry
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
TO: Inayat (NMI) Patel, Registered Agent	for Wellcare Rx Investments LLC
FIRM NAME	STREET ADORESS
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave
Specialty Pharmacy	
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Wheaton, IL 60187-5463	Producer of sterile drugs

Buildings used in the manufacture, processing, packing, or holding of a drug product do not have the suitable size to facilitate cleaning, maintenance, and proper operations.

Specifically,

On 8/12/15, I observed the following conditions in the cleanroom at the firm where sterile drug products are produced.

- 1. Shelves and carts used in the cleanroom are made of material that cannot be easily decontaminated.
 - a) A small laminate-covered wood ledge containing a bag of wipes, plastic bins, and a telephone next to the ISO-5 laminar air flow hood.
 - b) A metal shelf containing supplies in plastic bins on the opposite side of the ISO-5 laminar air flow hood. Some of the supplies included a container of pH paper, and a box of sterile needles.
 - c) Several plastic bins with sterile supplies such as gloves, bottles, and caps.
 - d) Two wooden carts containing plastic bins. The carts were stored underneath the counter top next to the ISO-5 laminar air flow hood. Each of the bins had supplies such sterile gloves, sterile syringes, sterile saline or water for production.
 - A counter top next to the ISO-5 laminar air flow hood containing a small incubator, a
 (b) (4)
 and a bottle of (b) (4)
- 2. Equipment was stored in the clean room that was not used to prepare sterile drug products.
 - a) A small incubator was stored on the counter top next to the ISO-5 laminar air flow hood.
 - b) A small (b) (4) was stored on the counter top next to the ISO-5 laminar air flow hood.

	AMEN	IDMENT 1	
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FORM FDA 483 (09/08)	PREVIOUS EDITION OBSOLETE INSI	ECTIONAL OBSERVATIONS	PAGE 15 OF 17 PAGES

	ALTH AND HUMAN SERVICES	
DISTRICT ADDRESS AND PHONE NUMBER	UG ADMINISTRATION DATE(S) OF INSPECTION	
550 W. Jackson Blvd., Suite 1500	08/12/2015 - 11/19/2015	*
Chicago, IL 60661-4716 (312) 353-5863 Fax:(312) 596-4187	3011707930	
Industry Information: www.fda.gov/oc/ind		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	t for Wellege De Terreterste IIO	
TO: Inayat (NMI) Patel, Registered Agen	STREET ADDRESS	
Wellcare Rx Investments LLC dba Denson's	200 E Willow Ave	
Specialty Pharmacy	TYPE ESTABLISHMENT INSPECTED	
Wheaton, IL 60187-5463	Producer of sterile drugs	
ODOEDWATION 47		
OBSERVATION 17		
Time limits are not established when appropriate for the cor	npletion of each production phase to assure the quality o	f the drug
product.		
Specifically		
Specifically,		
Time limitations have not been established for sor	ne(b) (4) used to prepare sterile drug	products
prepared by the firm. For example, the following		
products and time limitations have not been establ		
^		
Hydroxyprogesterone (b) (4)	, was used to make a (b) (4	
) (4), and expires (b) (4) . The firm does not have	
to support that the (b) (4) can be held for (4)
	ucts that are injected intramuscularly.	1
a) Hydroxyprogesterone (b) (4)	, was used to n	nake (b) (4)
(b) (4) (b) (4)	, prepared on (b) (4), expiration (b) (4).	oil
	e Hydroxyprogesterone Caproate 250 mg/ml in 5, prepared on 5/6/15, patient expiration 8/1/15	
c) (b) (4) was used (b) (4)	to prepare Hydroxyprogesterone Caproate	C.S. 12222.0
	t # 02-050715, prepared on $5/7/15$, patient exp	
8/1/15.	· · · · · · · · · · · · · · · · · · ·	
d) (b) (4) was used (b) (4)	to prepare Hydroxyprogesterone Caproate 2:	50
	ription # ^{(b) (4). (b) (6)} lot # 04-060815, prepared on	
patient expiration 8/1/15.		
e) (b) (4) was used (b) (4)	to prepare Hydroxyprogesterone Caproate	250
	ription $\#^{(b)(4),(b)(6)}$ lot $\#$ 16-070915, prepared on	7/9/15,
patient expiration 8/1/15.		
1		
AME	DMENT 1	
EMPLOYEE(S) SIGNATURE	DATE IS	SUED
SEE REVERSE Debra I. Love, Investigato	r Alt 01/0	06/2016
OF THIS PAGE	Norn	0072010
FORM FDA 483 (09/16) PREVIOUS EDITION OBSOLETE INS	PECTIONAL OBSERVATIONS PAGE 1	6 OF 17 PAGES

DISTRICT ADDRESS AND PHONE		LTH AND HUMAN S UG ADMINISTRATION	DATERS OF MOREOTUNI	
550 W. Jackso Chicago, IL (312) 353-586	n Blvd., Suite 1500	ıstry	DATE(S) OF INSPECTION 08/12/2015 - 11/1 FEINUMBER 3011707930	9/201
TO: Inayat (TO WHOW REPORT ISSUED NMI) Patel, Registered Agen	t for Wellcar	e Rx Investments L	LC
FIRM NAME Wellcare Rx I Specialty Pha CITY, STATE, ZUP CODE, COUNT	nvestments LLC dba Denson's rmacy	200 E Willo		
CITY, STATE, ZP CODE, COUNT Wheaton, IL		Producer of	sterile drugs	
	firm has no data to demonstrate the It is used in the (b) (4)	ne effectiveness	of the sporicide, (b) (4)
			NUMBER OF STREET, STRE	
	CCTION: /13/2015(Thu), 08/14/2015(Fri), 08/18/2015(08/2015(Tue), 09/11/2015(Fri), 10/01/2015(T			15(Th
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08/12/2015(Wed), 08	/13/2015(Thu), 08/14/2015(Fri), 08/18/2015(08/2015(Tue), 09/11/2015(Fri), 10/01/2015(T	ћи), 10/19/2015(Мог		DA

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The observations of objectionable conditions and practices listed on the front of this form are reported:

E's

1. - Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or

 To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgement, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."