

**PETITION FOR DECLARATORY STATEMENT BEFORE
FLORIDA DEPT OF HEALTH, DRUGS DEVICES AND
COSMETICS PROGRAM**

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK: *Racelle B*
DATE 8.12.08

to:

**Florida Dept of Health
Drug Devices and Cosmetics program
4052 Bald Cypress Way
Tallahassee, FI 32399-3251**

**Rebecca R Poston, Pharmacist, Executive Director
Sam Power, agency clerk**

from:

**Medical Arts Pharmacy, Inc
Steven S. Goodman
2950 Central Ave
St Petersburg, FI 33712
727.327.6185
727.327.6385 fax**

**Request for Declaratory Statement covered under
28-105 FAC.**

Regarding drug pedigrees covered in part by Chapter 499 and section
64F-12.012(3) FAC

The rules cause much non-creative clerical work and waste much
paper which will impact the environment.

Much of the time is spent retyping identical information from one set of forms on to an identical set of forms. This is mostly done on a manual basis. No new information is created.

I request that you permit me to use the method as shown on the exhibits.

Exhibit A....this is copy of electronic pedigree transmitted from wholesaler #1 (Amerisourcebergen) to wholesaler #2 (Medpoint).

Exhibit B...this is copy of electronic pedigree transmitted from Medpoint to Medical Arts. Copy of exhibit A is also sent.

Exhibit C...this is final pedigree from Medical Arts to final customer. A copy of exhibit A is also sent to final customer
Labels C-1 and C-2 provide all information required on pedigree and are a great saver of natural resources.


Steven S. Goodman, Pharmacist

8August2008