

# OFFICE OF THE ATTORNEY GENERAL CONSUMER PROTECTION DIVISION

# CIVIL INVESTIGATIVE DEMAND

To: Walmart, Inc.

70 SW 8<sup>th</sup> Street, Dept 8687 #0555 Bentonville, AR 72716-0555 c/o CT Corporation System 1999 Bryan Street, Suite 900 Dallas, TX 75201-3136 via CMRRR: 7014 1200 0000 2192 7666

via First Class Mail

Return Date: July 29, 2022

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices—Consumer Protection Act, Tex. Bus. & Com. Code §§ 17.41–17.63 ("DTPA"), Walmart, Inc. is hereby directed to produce the items listed in Exhibit "A" attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit "A" to the undersigned Assistant Attorney General or other authorized agent(s) identified by the Consumer Protection Division ("Division"). This documentary material shall be produced for inspection and copying during normal business hours at your principal office or place of business, or may be sent electronically or by certified mail to the Office of the Attorney General, 300 W. 15<sup>th</sup> Street, 9<sup>th</sup> Floor, Austin, TX 78701 and is due on July 29, 2022. If providing documents electronically, please provide them to Javier Juarez at javier.juarez@oag.texas.gov. Please contact one of the persons listed below upon receipt in order to discuss the return date and the logistics of producing the requested documents to the Consumer Protection Division.

The Division believes that you are in possession, custody, or control of documentary material relevant to the subject matter of an investigation of actual or possible violations of DTPA sections 17.46(a) and 17.46(b) for issues related to the advertising, marketing, promotion, sale, dispensing, and distribution of prescription opioids.

TAKE NOTICE THAT pursuant to section 17.62, Texas Business and Commerce Code, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 28th day of June, 2022.

/s/Stephanie Eberhardt

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#### **Instructions**

- 1. **Read These Instructions/Definitions Carefully.** Your production must comply with these instructions and definitions.
- 2. **Duty to Preserve Documents**. All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. Any ongoing, scheduled, or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise. Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
- 3. **Relevant Dates**. Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents from January 1, 2006, to the date of the production of documents in response to this Civil Investigative Demand, herein called "the relevant time period."
- 4. **Custody and Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control. A document is in your custody and control if it is in the possession of another person and you have a right to possess that document that is equal or superior to that other person's right of possession. On the rare occasion that you cannot obtain the document, you must provide an explanation as to why you cannot obtain the document which includes the following information:
  - a. the name of each author, sender, creator, and initiator of such document;
  - b. the name of each recipient, addressee, or party for whom such document was intended;
  - c. the date the document was created;
  - d. the date(s) the document was in use;
  - e. a detailed description of the content of the document;
  - f. the reason it is no longer in your possession, custody, or control; and
  - g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

- 5. **Non-identical Copies to be Produced.** Any copy of a document that differs in any manner, including the presence of handwritten notations, different senders or recipients, etc. must be produced.
- 6. **No Redaction**. All materials or documents produced in response to this Civil Investigative Demand shall be produced in complete unabridged, unedited, and unredacted form, even if portions may contain information not explicitly requested, or might include interim or final

editions of a document.

- 7. **Document Organization**. Each document and other tangible thing produced shall be clearly designated as to which request, and each sub-part of a request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
- 8. **Production of Documents.** You may submit photocopies (with color photocopies where necessary to interpret the document) in lieu of original hard-copy documents if the photocopies provided are true, correct, and complete copies of the original documents. If the requested information is electronically stored information, it shall be produced in electronic form. Electronically stored information shall be produced with the accompanying metadata, codes, and programs necessary for translating it into usable form, or the information shall be produced in a finished usable form. For any questions related to the production of documents you may consult with the Office of the Attorney General representatives above.
- 9. **Privilege Log.** For each Document and any other requested information that you assert is privileged or for any other reason excludable from production, please provide a privilege log, wherein you:
  - a. Identify that Document and other requested information;
  - b. State each specific ground for the claim of privilege or other ground for exclusion and the facts supporting each claim of privilege or other ground for exclusion;
  - c. State the date of the Document or other requested information; the name, job title, and address (including city, state and ZIP Code) of the person who prepared it; the name, address (including city, state, and ZIP Code), and job title of the person to whom it was addressed or circulated or who saw it; and the name, job title, and address (including city, state, and ZIP Code) of the person now in possession of it; and
  - d. Describe the type and subject matter of the Document or other requested information.

# **Definitions**

- 1. "You," "Your," "the business," "Walmart," "Wal-Mart," and/or "Walmart Inc." (also referred to herein as the "Company") means the entity named on page one of this Civil Investigative Demand and includes its past and present officers, employees, agents and representatives, parents and predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and all persons and entities acting or purporting to act under the guidance of or on behalf of any of the above. The terms "subsidiary," "affiliate," and "joint venture" refer to any firm in which there is total or partial ownership (25 percent or more) or control between the Company and any other person or entity.
- 2. The words "and" and "or" shall be construed either conjunctively or disjunctively as

required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.

- 3. "**By Drug**" or "**Drug-by-Drug**" means drug name (*e.g.*, oxycodone), product name (*e.g.*, Opana ER), National Drug Code (NDC), DEA base code, strength, unit size, and form.
- 4. "**Communication**" means any conversation, discussion, letter, email, memorandum, meeting, note, or other transmittal of information or message, whether transmitted in writing, orally, electronically, or by any other means.
- 5. "Compliance Contractor" means any third party that You used to assist Your efforts to comply with the federal Controlled Substances Act or Texas Occupations Code § 565.002(a)(9) and 22 Texas Administrative Code § 281.8's duty to establish and maintain effective controls against diversion of prescription drugs, Texas Health and Safety Code § 481.067's duty to keep records and maintain inventories in compliance with recordkeeping and inventory requirements of federal law and as required by the Texas Board of Pharmacy, and 22 Texas Administrative Code Chapter 315's duties regarding the Texas Prescription Monitoring Program (PMP).
- 6. "Concerning" or "Relating to" means related to, referring to, pertaining to, concerning, describing, regarding, evidencing, or constituting.
- 7. "Customer" means any Person, including pharmacies, to which Walmart distributes Opioids, benzodiazepines, and/or scheduled muscle relaxers.
- 8. "**DEA**" means the United States Drug Enforcement Administration.
- "Document" is used herein in the broadest sense of the term and means all records and 9. other tangible media of expression of whatever nature however and wherever created, produced, or stored (manually, mechanically, electronically, or otherwise), including without limitation all versions whether draft or final, all annotated or nonconforming or other copies, electronic mail (email), instant messages, text messages or other wireless device messages, voicemail, calendars, date books, appointment books, diaries, books, papers, files, notes, confirmations, accounts statements, correspondence, memoranda, reports, records, journals, registers, analyses, plans, manuals, policies, telegrams, faxes, telexes, wires, telephone logs, telephone messages, message slips, minutes, notes or records or transcriptions of conversations or Communications or meetings, tape recordings, videotapes, disks, and other electronic media, microfilm, microfiche, storage devices, press releases, contracts, agreements, notices, and summaries. Any non-identical version of a Document constitutes a separate Document within this definition, including without limitation drafts or copies bearing any notation, edit, comment, marginalia, underscoring, highlighting, marking, or any other alteration of any kind resulting in any difference between two or more otherwise identical Documents. In the case of Documents bearing any notation or other marking made by highlighting ink, the term Document means the original version bearing the highlighting ink, which original must be produced as opposed to any copy thereof.
- 10. "**Employee**" shall mean any present or former employee, officer, director, partner, attorney, accountant, consultant, advisor, independent contractor, agent, guardian, conservator, next friend or other person or entity presently or formerly purporting to act on Your behalf, whether a full-time, part-time, piece-work, commission, or other basis and whether paid or unpaid.

# 11. "**Identify**" means the following:

- a. With respect to a natural Person, the complete name, any alias(es), social security number, date of birth, occupation, title(s), job responsibilities, street and mailing address for both home and business at the time in question and at the time of responding (if different), home, cellular, and business telephone numbers, and personal and business email addresses;
- b. With respect to an entity, its name(s), business address(es), legal address(es), state(s) of incorporation, registered or unregistered tradename(s), name(s) under which it does business, or any other affiliated name(s), electronic email domains and websites operated by the entity, tax identification number(s), and the identity of its agent(s) for the service of process; and
- c. With respect to a Document, its Bates or other sequential notation, title, date, location, author(s), signatory(ies), recipient(s), description (*e.g.*, memorandum, letter, contract, form), the number of pages, and a summary of the contents.
- 12. "**Opioid**" means all naturally occurring, synthetic, or semisynthetic substances, compounds, or drugs that bind to receptors in the brain and are involved in the control of pain and other functions including, but not limited to, buprenorphine, codeine, fentanyl, hydrocodone, hydromorphone, meperidine, methadone, morphine, opium, oxycodone, tapentadol, and oxymorphone.
- 13. "Order Information" means any order for Opioids placed or filled by You, and includes the following information: (i) the distributor or wholesaler with which You placed the order or the Customer for which You filled the order; (ii) a description of all Opioids received in each order, including drug name (*e.g.*, oxycodone), product name (*e.g.*, Opana ER), National Drug Code (NDC), DEA base code, strength, unit size, and form; (iii) the quantity of units ordered and received of each Opioid in each order; (iv) the dates on which each Opioid in each order was ordered and received; and (v) the price paid for each Opioid distributed in each order.
- 14. "Order of Interest" means an order for Opioids that You identified as being potentially subject to the federal Controlled Substances Act or any State's duty to design, establish, and operate a system to disclose Suspicious Orders (as defined below); to report Suspicious Orders; and to guard against, prevent, and maintain effective control against the diversion of controlled substances.
- 15. "**Person**" means any natural person or any legal entity, including, without limitation, any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or firm.
- 16. "**Red flag**" shall mean any warning sign, factor, or indicia that could indicate opioid abuse, misuse, or diversion to a pharmacist related to prescribers, patients, or prescriptions, that gives a pharmacist some reason to question or suspect that a prescription might not be for a legitimate medical purpose.
- 17. "Suspicious Orders" has the same meaning as provided in the Preventing Drug Diversion Act of 2018 and include, but are not limited to, orders of unusual size, orders deviating

substantially from a normal pattern, and orders of unusual frequency.	

#### **EXHIBIT A: DOCUMENTS TO BE PRODUCED**

In accordance with the requirements set forth in the "Definitions" and "Instructions" sections of this Civil Investigative Demand, you are specifically required to respond in writing to each of the following Requests within the time frame set forth below:

#### Part A (produce within 30 days)

- 1. Documents sufficient to identify the Person(s) answering and/or assisting in answering this CID on Your behalf.
- 2. Documents sufficient to identify the total number of Opioids Drug-by-Drug that Walmart distributed in Texas per calendar year during the relevant timeframe and identify the total revenue by calendar year from the distribution of those Opioids.
- 3. Documents sufficient to identify the total number of Opioids Drug-by-Drug that Walmart dispensed in Texas per calendar year during the relevant timeframe and identify the total revenue by calendar year from the sale of those Opioids.
- 4. Documents sufficient to identify Walmart's overall share of the Texas Opioid market, by units, including the MME of each unit, and in dollars, for every calendar year during the relevant timeframe. Identify the Opioid(s) that You include.
- 5. For each year in the relevant timeframe, Documents sufficient to identify Your profits from Your sale of Opioids, by units, including the MME of each unit, and in dollars. Identify the Opioid(s) that You include.
- 6. Documents sufficient to identify the names and addresses of the twenty-five (25) retail pharmacies to which Walmart has distributed the most Opioids in Texas per calendar year during the relevant timeframe and identify the volume of Opioids by units sold to each such pharmacy by calendar year on a Drug-by-Drug basis.
- 7. Documents sufficient to identify names and addresses of Your twenty-five (25) retail pharmacies in Texas which dispensed the most Opioids in Texas per calendar year during the relevant timeframe and identify the volume of Opioids by units sold by each such pharmacy by calendar year on a Drug-by-Drug basis.
- 8. For the twenty-five (25) retail pharmacies identified in the prior response, provide all dispensing records for all Opioids, benzodiazepines, and scheduled muscle relaxers sold, including those records with the name, address, and birthdate of each patient, name and address of each prescriber, prescriber specialty, indication or diagnosis, drug name, product name, and strength of the medication, quantity dispensed, number of days' supply, method of payment (insurance, self-pay, voucher, or otherwise), date of prescription, dispensing date, and amount of payment.
- 9. For each of Your pharmacies in Texas, documents sufficient to identify the total number of prescription transactions and total number of individual patients for each calendar year during the relevant timeframe that included an Opioid, benzodiazepine, and a scheduled muscle relaxer as part of a single sales transaction with an individual patient or as part of separate transactions with the same individual patient within an eight (8) day time period.

- 10. All Documents Relating to the top twenty-five (25) Opioid prescribers in Texas based on Your dispensing records and their rates of prescribing.
- 11. Documents sufficient to identify all investigations conducted by, or lawsuits filed by, any local, state, tribal, federal, or international governmental entity Relating to Walmart's Opioid distribution or dispensing practices and any related settlements or dispositive orders.
- 12. Documents and reports Relating to all internal investigations and audits conducted by, or on behalf of, Walmart Relating to Opioid distribution and dispensing practices in Texas and nationally. Documents should include the Persons who conducted the investigations and audits, why the investigations and audits were conducted, the dates of the investigations and audits, and the results of the investigations and audits.
- 13. Documents relating to Walmart's global exclude lists of prescribers, clinics, or practice groups in Texas, including for each prescriber, when he/she was added to the global exclude list, the reasoning, and if/when he/she was removed from the global exclude list. The scope of this request includes store-level refusals for certain prescribers, regional-level lists, and corporate-level lists.
- 14. Documents describing the design and operation of any Suspicious Order monitoring systems (SOMS) used by Walmart including, but not limited to, the parameters assigned to identify potentially Suspicious Orders related to Opioids, any algorithms used to identify potentially Suspicious Orders, and any factors used to set thresholds to identify potentially Suspicious Orders by new Customers.
- 15. Documents sufficient to identify the persons overseeing any SOMS used by Walmart.
- 16. All Documents Relating to each Suspicious Order made by Texas Customers, Walmart's reporting of such Suspicious Orders to the DEA, and Walmart's reporting of Suspicious Orders to any Texas state agency during the relevant timeframe. Responsive Documents must include:
  - a. A copy of each report;
  - b. All Order Information for all Opioids included in each report;
  - c. The date on which each report was submitted to the DEA;
  - d. The DEA office to which each report was submitted;
  - e. All other federal or state agencies to which You submitted each report;
  - f. The manner in which You submitted each report to the DEA or any other governmental authority; and
  - g. The reason why You reported each order.
- 17. All Documents Concerning each Order of Interest within Texas. Responsive Documents must include:
  - a. All Order Information for all Opioids included in each Order of Interest;

- b. The date on which You first identified each order as an Order of Interest;
- c. The reason why each order was identified as an Order of Interest;
- d. For each Opioid included in each Order of Interest, whether You fulfilled the Order;
- e. For each Opioid included in each Order of Interest, all Documents Concerning deliberations and determinations whether to fulfill the order; and
- f. All federal or state agencies, including the DEA, to which You reported each Order of Interest (if applicable).
- 18. For each of Your pharmacy employees who previously worked or are working in Your Texas locations in connection with Walmart's dispensing or distribution of Opioids, provide the following:
  - a. All Documents concerning any disciplinary actions by You or a regulatory Board such as the Board of Pharmacy against any of those pharmacy employees;
  - b. All Documents reflecting orientation, training, or directions given to those pharmacy employees including, but not limited to, training manuals and training related to the handling of Suspicious Orders and Orders of Interest;
  - c. All Documents reflecting a warning, reprimand, discipline, or termination for Opioid-related conduct.
- 19. All Documents sent to, received from, or concerning the healthcare providers, clinics, and/or pharmacies listed on Appendix 1.
- 20. All Documents and Communications Relating to overdoses or overdose deaths of any of Your Texas pharmacies' patients.
- 21. All Documents and Communications with any Compliance Contractor or consultant regarding Your pharmacies in Texas including, but not limited to, referrals, reports, and recommendations as well as reports relating to the distribution or dispensing of Opioids in Texas.
- 22. All audited financial statements, including income statements, cash flow statements, and balance sheets.
- 23. Your corporate federal and any state tax returns for Texas and all Communications with federal and Texas tax authorities.

## Part B (produce within 60 days)

- 24. Documents sufficient to identify each business entity (*e.g.*, parent, affiliate, sister, subsidiary) in Texas that collectively comprise Walmart, including which business entities are engaged in the distribution of Opioids, benzodiazepines, and scheduled muscle relaxers.
- 25. Documents sufficient to identify each business entity (*e.g.*, parent, affiliate, sister, subsidiary) in Texas that collectively comprise Walmart, including which business entities are engaged in the dispensing of Opioids, benzodiazepines, and scheduled muscle relaxers.

- 26. Documents sufficient to identify each business division in Texas involved in the distribution of Opioids, benzodiazepines, and scheduled muscle relaxers. Include all business divisions including those involved in tracking those controlled substances, marketing, reporting, and ensuring government compliance.
- 27. Documents sufficient to identify all of Walmart's distribution centers engaged in the distribution of Opioids within Texas, including each center's DEA number or designation.
- 28. Documents sufficient to identify all databases Walmart uses to track or maintain information Relating to the distribution of Opioids.
- 29. Documents sufficient to identify all databases Walmart uses to track or maintain information Relating to the dispensing of Opioids.
- 30. Documents describing policies and procedures, including any unwritten or informal policies and procedures, Walmart has implemented or maintained Concerning its distribution and dispensing of Opioids including, but not limited to, the following areas: (i) the training of its employees involved in the distribution and dispensing of Opioids, including training Relating to handling of Suspicious Orders; (ii) controls against diversion of Opioids; (iii) monitoring sales of Opioids and identification of potentially Suspicious Orders; (iv) conducting due diligence of customers placing potentially Suspicious Orders; (v) handling Suspicious Orders that Walmart has identified, including any Relating to reporting Suspicious Orders to the DEA or any Texas state agency; (vi) compensating employees whose job responsibilities include establishing and maintaining relationships with Customers and/or whose job responsibilities include engaging in the distribution or dispensing of Opioids; and (vii) employee quotas, sales goals, or other benchmarks of performance for the distribution, dispensing, and/or sale of Opioids.
- 31. Documents relating to all policies and procedures concerning: (i) pharmacy metrics, pharmacy performance, and/or pharmacy goals; (ii) bonus or incentive plans offered to any pharmacist related in any way to the pharmacist's productivity; and (iii) the evaluation of pharmacists based on productivity.
- 32. For each of Your pharmacy employees who worked or are working in Your Texas locations in connection with Walmart's dispensing or distribution of Opioids and who were reprimanded, disciplined, or terminated for Opioid-related conduct, Documents sufficient to identify the employees in accordance with the Instructions above and provide the past and present duration and store location(s) of each employee's employment and annual compensation (including any incentive compensation) during the relevant timeframe.
- 33. Documents sufficient to identify all of Your employees who were tasked with managing an account with any Opioid manufacturer or distributor or who otherwise communicated with any Opioid manufacturer or distributor. For purposes of this request, include the name of the Opioid manufacturer or distributor and the name of the individual at the Opioid manufacturer or distributor with which Your employee communicated.
- 34. Documents sufficient to identify when each of Your pharmacies in Texas began performing checks of the Controlled Substance Monitoring Database.
- 35. All Communications with Customers in Texas relating to identification and reporting of

Suspicious Orders.

- 36. All Documents that Walmart has provided to the DEA pursuant to the requirements of the Controlled Substances Act, 21 U.S.C. § 801 *et seq.*, concerning Texas healthcare providers or pharmacies and Opioids.
- 37. All Documents that Walmart has provided to or received from the Health Distribution Alliance Relating to Opioid dispensing or distribution, including Documents Relating to distribution or dispensing obligations, reporting obligations, and best practices.
- 38. All Documents Relating to Walmart's due diligence of Texas Opioid Customers including, but not limited to, all notes Relating to Walmart's in-person visits, all evaluations made based on the visits and obtained information, all responses to requests for the Customer to provide information, and all determinations made whether to fill Opioid orders placed by the Customer.
- 39. All promotional or marketing Documents related to Opioids that Walmart has distributed at the request of a drug manufacturer including, but not limited to, savings cards, discount cards, and other reimbursement methods. For each Document, provide a copy of the Document, and Identify the recipients of the Document, their geographic locations, and the time period during which the Document was distributed.
- 40. All Documents You have provided to pharmacy employees in Texas about identifying "red flags," or indicators of abuse, diversion, or a prescription that is not medically legitimate or therapeutically necessary.
- 41. All Documents regarding adjustments of threshold levels or limits on the volume of Opioids that could be ordered per month.
- 42. All Documents regarding any cessation of business in Texas between You and any distributor or wholesaler that supplied Opioids or other controlled substances. Include Documents sufficient to identify who terminated the business relationship, when, and the reasoning for such termination.
- 43. For each Suspicious Order Concerning Opioids that Walmart has identified during the relevant timeframe in Texas, documents sufficient to identify the Order Information, the reason why the order was identified as suspicious, whether the order was reported to the DEA, whether the order was reported to any Texas state agency, and whether the order was shipped.
- 44. For each Order of Interest Concerning Opioids in Texas that You did not identify in the prior response, documents sufficient to identify the Order Information, the reason why the order was identified as potentially suspicious, to which State agencies the order was reported (if applicable), and whether the order was shipped.
- 45. Documents describing Walmart's policies and procedures Relating to Document preservation or destruction.

#### **APPENDIX 1:**

# HEALTHCARE PROVIDERS, CLINICS, PHARMACIES

- 1. Christopher Kalejaiye Ajayi
- 2. Bartholomew Anny Akubukwe
- 3. Brian James August
- 4. Briargrove Pharmacy
- 5. Kesia Banks
- 6. Clinton Battle
- 7. Beco Pharmacy
- 8. Better Life Pain Clinic
- 9. Brandy Pharmacy
- 10. Ethel Oyekunle-Bubu
- 11. Caesar Mark Capistrano
- 12. Calvary Pharmacy
- 13. Continuous Medical Care and Rehabilitation
- 14. Gazelle Craig
- 15. Gregory Comer
- 16. Carl D'Agostino
- 17. David D. Devido
- 18. Howard Gregg Diamond
- 19. Diamondback Pain & Wellness Center
- 20. Ethel's Pharmacy
- 21. Christopher Elder
- 22. Richard Arthur Evans
- 23. Golden Pharmacy
- 24. Akili Graham
- 25. Jillian S. Graham

- 26. Derrick Z. Goodwill
- 27. Uma Rani Gullapalli
- 28. Integra Medical Clinic/Texas Pain Solutions
- 29. Imed Clinic
- 30. Daniel Boris Hadzic
- 31. Arthur Hernandez
- 32. Diana Hernandez
- 33. Kathy Hernandez
- 34. Callie Herpin
- 35. Jacqueline Hill
- 36. Houston Pain & Rehabilitation Clinic
- 37. Steven Inbody
- 38. Joel Joselevitz
- 39. Horace LeBlanc
- 40. Alfonso Luevano
- 41. Ashley McCain
- 42. Cedric Milburn
- 43. Nedal Helmi Naser
- 44. Tameka Lachelle Noel
- 45. Ngozika Tracey Njoku
- 46. Franklin Nwabugwu
- 47. The Oaks Medical Clinic
- 48. Linda Roos
- 49. Greggory Phillips
- 50. Preferred Medical Clinic
- 51. Remcare Pharmacy
- 52. Mitchell Roderick

- 53. Hugo A. Rojas
- 54. S&S Pharmacy
- 55. David Shafer
- 56. David Shin
- 57. John Sims
- 58. Spring Wellness Center
- 59. Judson Somerville
- 60. South Houston Treatment Center
- 61. James Stocks
- 62. Rosemary Ann Stogre
- 63. Tad W. Taylor
- 64. Chia Jen Lee a/k/a Chia Jen Lee-Taylor
- 65. Taylor Texas Medicine
- 66. Wilkinson Oloyede Thomas
- 67. Hoai-Huong Truong
- 68. Hieu Troung
- 69. Charles Walton
- 70. Winrock Medical Clinic
- 71. Prince White
- 72. UMAT Clinic
- 73. Benjamin Ybarra