The JADA Foundation, Inc.
A Kentucky 501(c)(3) Public Charity
Lexington, KY 40509

February 20, 2026

Hon. Russell Coleman
Attorney General of Kentucky
Office of the Attorney General
1024 Capital Center Drive
Frankfort, KY 40601

Re: Request for Review and Consumer Protection Assessment – Compounded GLP-1 / GIP Drug Products in the Commonwealth of Kentucky

Dear Attorney General Coleman,

The JADA Foundation, Inc., a Kentucky nonprofit public charity, respectfully requests that the Office of the Attorney General conduct such review or assessment as your Office deems appropriate regarding the advertising, prescribing, compounding, and sale of compounded GLP-1 and GIP drug products made available to consumers within the Commonwealth of Kentucky, including through telehealth platforms and out-of-state compounding arrangements serving Kentucky residents.

This request applies to all dosage forms and routes of administration, including, without limitation, injectable, oral, capsule, tablet, sublingual, transdermal, topical, and other compounded preparations.

This submission is made in the public interest and is grounded in patient safety, consumer protection, and the integrity of Kentucky's drug distribution and oversight framework. The Board authorized submission of a consumer-protection request to the Attorney General.

**Organizational Purpose and Independence**

The JADA Foundation is organized exclusively for charitable and educational purposes under Section 501(c)(3) of the Internal Revenue Code. The Foundation's mission includes promoting medication safety, preventing drug-related injury, supporting vulnerable patients, and advancing public understanding of regulatory accountability within healthcare systems.

The Foundation:

- Does not provide medical care;
- Does not compound or dispense medications;
- Does not operate telehealth platforms;
- Does not represent any commercial, competitive, or industry interest; and
- Does not act on behalf of any individual patient in this matter.

This request is not connected to, coordinated with, or intended to influence any private legal proceeding. It is submitted solely in the Foundation's nonprofit educational and consumer-protection capacity to request an independent review of industry-wide practices that may affect Kentucky residents, not an individual or an individual entity.

The Foundation will not seek financial assistance, reimbursement, or resource allocation from the Office of the Attorney General or any other governmental entity in connection with this request.

**Public Health and Consumer Protection Considerations**

Based on publicly available materials and consumer-facing marketing representations accessible to Kentucky residents, the Foundation has observed widespread promotion and sale of compounded drug products described as:

- Compounded tirzepatide;
- Compounded semaglutide;
- GLP-1 and/or GIP-related compounds combined with vitamins, amino acids, or other additives; and
- Products marketed as "alternatives," "equivalents," or "substitutes" for FDA-approved GLP-1/GIP medications.

These products are frequently promoted through telehealth platforms, subscription-based models, online prescribing arrangements, and fulfillment relationships with compounding pharmacies located both within and outside Kentucky.

GLP-1 and GIP medications are pharmacologically active agents with clinically significant dosing considerations and known risk profiles. While sterile injectable compounding presents distinct safety considerations, risks may also arise across oral, capsule, tablet, sublingual, transdermal, topical, and other compounded dosage forms, including concerns relating to:

- Potency and bioavailability
- Stability and sterility
- Ingredient sourcing
- Labeling clarity
- Consumer disclosure
- Marketing representations

Marketing statements that imply equivalence to FDA-approved products or otherwise blur distinctions regarding regulatory review status may materially affect consumer understanding, particularly among individuals managing chronic health conditions such as obesity.

The Foundation expresses no accusations or predetermined conclusions regarding the legality of any specific entity or product. However, given the expanding scale of marketing and consumer uptake across dosage forms, the Foundation believes an independent review may be appropriate to ensure Kentucky consumers are fully protected under existing law.

**Regulatory Context**

Tirzepatide and semaglutide are FDA-approved only in specific branded formulations and for defined indications. Compounded versions of these drugs, regardless of dosage form, are not FDA-approved and do not undergo FDA premarket review for safety or efficacy.

Federal law restricts the compounding of drug products that are ‘essentially copies’ of commercially available drugs except under defined statutory circumstances. Kentucky law incorporates federal standards on drug misbranding, adulteration, and limitations on compounding. Additionally, Kentucky’s Consumer Protection Act (KRS 367.110 et seq.) prohibits unfair, false, misleading, or deceptive acts or practices in trade or commerce affecting Kentucky consumers.

The Foundation is aware that legislative discussions have taken place regarding pharmaceutical compounding oversight and drug safety standards. The Foundation takes no position on any pending or proposed legislation in this submission. This request is confined to consideration of existing statutory and regulatory frameworks and their application, as your Office deems appropriate.

**Areas Potentially Warranting Independent Review**

Without presuming any outcome, the Foundation respectfully identifies areas that may merit independent assessment:

- Advertising or marketing representations concerning FDA approval status, safety evaluation, or product equivalency;
- Consumer disclosures regarding compounding status and regulatory oversight distinctions;
- Telehealth prescribing models affecting informed consent or continuity of care;
- Compounding practices that may resemble standardized manufacturing rather than individualized patient compounding;
- Financial or operational relationships between telehealth entities and compounding pharmacies that may affect clinical independence;

- Sourcing, representation, and labeling of active pharmaceutical ingredients in compounded formulations.

The Foundation does not seek to direct the scope, methods, or conclusions of any inquiry and fully respects the independence and discretion of your Office.

**Requested Action**

The JADA Foundation respectfully requests that the Office of the Attorney General:

1. Conduct such review, inquiry, or assessment as your Office determines appropriate within its statutory authority;
2. Coordinate, as necessary, with relevant Kentucky regulatory agencies while respecting jurisdictional boundaries; and
3. Take any consumer-protective, remedial, or enforcement actions warranted by the facts and applicable law.

This request is made solely to promote patient safety, transparency, and public trust in Kentucky's healthcare system.

**Closing**

The Foundation reiterates that this submission:

- Asserts no accusation;
- Draws no predetermined legal conclusion;
- Is not made on behalf of any individual litigant;
- Is independent of any private dispute; and
- Seeks only to support appropriate consumer protection oversight within the Commonwealth.

Should your Office find it helpful, the Foundation would be pleased to meet with you or your staff to advance this request as appropriate.

Thank you for your consideration and for your continued service to the people of Kentucky.

Respectfully,

Carl Wilson
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