

# **T.C. FROST, PHARM.D., J.D., CPBS**

## *Expert Witness Engagement Profile*

Dr. T.C. Frost is a pharmacy law expert and Doctor of Pharmacy with twenty-plus years of pharmacy operations, executive compliance leadership, and direct PBM contracting experience. PharmD, JD in Health Law, and Certified Pharmacy Benefits Specialist. Passed the Uniform Bar Examination, February 2026. Founded and scaled a multi-location independent pharmacy to approximately twelve million dollars in annual revenue. Adjunct Professor of Clinical Pharmacy at the University of Tennessee Health Science Center. Author of forthcoming law review scholarship on ERISA preemption and PBM market foreclosure. Available as a consulting or testifying expert nationwide.

## **SCOPE OF OPINION AREAS**

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- Pharmacy benefit manager (PBM) contracting; network admission, credentialing, recredentialing, and provider-manual compliance.
- ERISA Section 514 preemption analysis and state PBM regulation conflicts.
- Pharmacy compounding compliance: USP 795, 797, 800; PCAB, UCAP, and ACHC accreditation standards.
- Standard of care for pharmacy operations and pharmacist practice.
- PSAO selection, contracting, and pharmacy-payer negotiation strategy.
- DEA and FDA audit preparation, response, and defense.
- State Board of Pharmacy inspections and disciplinary proceedings.
- Pharmacy reimbursement methodology, PBM pricing, MAC pricing, and spread-pricing analysis.
- Pharmacy operations, P&L management, multi-location management, and executive pharmacy leadership.
- Healthcare antitrust as applied to PBM vertical integration.
- False Claims Act and qui tam matters involving pharmacy and PBM conduct.

## **QUALIFICATIONS**

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- Doctor of Pharmacy, University of Tennessee Health Science Center, 2002.
- Juris Doctor (Health Law concentration), University of Tennessee College of Law, 2021.
- Certified Pharmacy Benefits Specialist (CPBS), Pharmacy Benefits Institute of America.
- Tennessee Pharmacist License No. 12080; active and in good standing; no disciplinary history.
- Uniform Bar Examination passed, February 2026.
- Adjunct Professor of Clinical Pharmacy, University of Tennessee Health Science Center, 2014 to present.
- Founder of Volunteer Pharmacy, Inc.; scaled multi-location operations to approximately twelve million dollars in annual revenue and forty-two employees.
- Author of forthcoming law review article, The PBM Shield: ERISA Preemption and the Foreclosure of Pharmacy Competition.

## **ENGAGEMENT AVAILABILITY**

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- Sides: plaintiff and defense.
- Formats: consulting expert; testifying expert; written reports; depositions; trial testimony.
- Venues: federal court; state court; administrative proceedings (DEA, FDA, State Boards of Pharmacy); arbitration.
- Geographic: nationwide engagements; based in Knoxville, Tennessee.

## **ENGAGEMENT PROCESS**

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- Initial conflicts check at no charge.
- Written retention agreement and retainer required before substantive engagement.
- Fee schedule and curriculum vitae provided upon request.

## **CONTACT**

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