

People



Martin R. Dix

Partner, Healthcare

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vCard

” Martin Dix is incredibly knowledgeable in pharmaceutical law.

- *Chambers USA*

Board Certified by The Florida Bar in Health Law, Martin Dix focuses his practice primarily on pharmacy and drug distribution law. His clients encompass nearly all aspects of the legal drug delivery system, including pharmacies, pharmacists, and pharmacy benefit managers; drug wholesalers; drug and dietary supplement manufacturers; retail medical oxygen dealers; and compressed medical gases wholesalers. He has also represented a variety of other health care providers and entities, such as physician practices, health care clinics, clinical laboratories, assisted living facilities, mental health centers, home health agencies and hospitals.

Clients rely on Martin for counsel on pharmacy and healthcare-related licensing, regulatory, HIPAA, Medicaid and Medicare, contract and reimbursement issues.

With a comprehensive understanding of the state and federal regulatory agencies, Martin represents clients before the Food and Drug Administration (FDA), Drug Enforcement Administration (DEA), Florida Board of Pharmacy, Agency for Health Care Administration, Florida Department of Health, Department of Business and Professional Regulation Division of Drugs, Devices and Cosmetics, Office for Civil Rights, Medicaid, Centers for Medicare and Medicaid Services, Agency for Persons with Disabilities, Florida Disabilities Council, Florida Attorney General's Office, Division of Administrative Hearings, Florida Governor and Cabinet, and other state and federal agencies.

Areas of Experience

Healthcare
Government Agency Litigation
Healthcare Fraud and Abuse
Healthcare Legislation and Government Affairs
Healthcare Licensure and Compliance
Medicare, Medicaid, and Third Party Reimbursement
Pharmacy, Drugs, and Medical Devices
Cannabis
Senior Living and Care
Health and Life Sciences

Education

J.D., Florida State University College of Law, 1985, with honors
B.S., Florida State University, 1977

Admissions

Bars

Florida

Related Content

Kirk Davis, Martin Dix, Philip Sprinkle, and John Hood to Speak on Advanced Health Law Topics & Certification Review 2025
March 14, 2025

Martin Dix to Speak on the Future of Pharmacy Law in Florida
December 07, 2024

Akerman Sponsors Annual ASPL Developments in Pharmacy Law Seminar
November 07, 2024

Martin is an active member of Akerman's Cannabis Practice, which provides counsel to clients on the complex legal and business issues impacting companies with interests in the medical and adult-use cannabis industries. He has represented medical marijuana dispensaries and treatment providers on a myriad regulatory issues.

Notable Work

Pharmacy Chains: Represented numerous pharmacies, including one national pharmacy chain on disciplinary cases and one 7 state pharmacy chain on regulatory, licensing, professional disciplinary; rulemaking, reimbursement, and contract issues.

Hospital Drug Distribution Systems: Represented six major hospitals and hospital systems on a variety of licensing, healthcare, pharmacy, medical marijuana and drug distribution law issues. Represented a joint effort by two health care systems to amend Florida's drug distribution laws impacting hospitals.

Prescription Drug Wholesalers: Represented prescription drug wholesalers on a variety of issues related to Track and Trace, pill mills, authentication, background checks, purchases from unauthorized sources, license denials, and other licensing, contract, recordkeeping and enforcement issues. Secured a Declaratory Statement in multiple states to recognize the intracompany transfer exemption for prescription drug distributions.

National Dialysis Provider: Represented national dialysis provider in pharmacy and prescription drug distribution regulatory issues, including securing exemption to distribute \$2 million worth of drugs and successful challenge to \$270,000 PBM audit.

National Hospital System: Represented a national hospital system on sterile compounding issues (USP 797) and on adoption of central fill pharmacy rules

Pharmacy Chain: Represented a pharmacy chain on waiver of DEA registration requirements for Florida Medicaid.

Medical Marijuana: Represented a medical marijuana dispensary on regulatory issues.

Pharmacy Chains: Represented numerous pharmacies, including one national pharmacy chain and one 7 state pharmacy chain on regulatory, licensing, professional discipline; rulemaking, reimbursement, and contract issues.

Assist Board of Pharmacy with Change of Ownership Rules: At the Boards request, assist it in amending and modernizing the Change of Ownership and Commencement of Operation Rules.

Acquisition: Represented a pharmacy chain on acquisition of 100 pharmacies in 2 states

Trade Association: Represented a pharmacy trade association on appeal of pharmacy's duty to warn to Florida Supreme Court.

Legislative and Regulatory Counseling: Represented a statewide pharmacy association for over fifteen years on all pharmacy legislative and regulatory issues.

Hospital Systems: Represented five major hospital systems on a variety of licensing, healthcare, pharmacy, and drug distribution law issues.

Medicaid: Represented pharmacies on Medicaid audits.

Multistate Reviews: Represented health care clients on multistate reviews, including physician dispensing, non-resident pharmacy and dme licensing, patient education, orthotic licensing, pharmacy change of ownership requirements, drug pedigree requirements, internet pharmacy, pharmacy record retention, pharmacy electronic record requirements, auto-refill programs, automated dispensing, and physician dispensing.

Regulatory Counseling and Bid Protests: Represented a specialty pharmacy on a variety of pharmacy regulatory issues, including bid protests in Florida and Arizona relating to selection of Hemophilia drug providers.

Compounding Rule: Represented a pharmacy compounding association before the Florida Board of Pharmacy regarding the compounding rule.

Pharmacy Automation Rule: Represented mail order pharmacy on revisions to the pharmacy automation rules.

Antitrust: Represented Florida plaintiffs in nationwide antitrust action against brand name prescription drug companies.

Injectibles: Represented a nationwide compounding pharmacy in negotiations with the Southeast Regional DEA Office on the dispensing of injectables to physicians as patient's agents.

Medical Quality Assurance: Represented a pharmacist in connection with the Department of Health's Medical Quality Assurance statute on license revocation.

HMO: Represented an HMO on contract issues for a third-party prescription drug contract with a PBM.

Contract Negotiation: Represented clients in negotiation of contracts with pharmacy benefit managers, prescription drug wholesalers, pharmacy claims processors, and with pharmacy market share entities.

Mail-Order Veterinary Pharmacy: Represented a national mail-order veterinary pharmacy on pharmacy regulatory issues.

Multistate Reviews: Represented health care clients on multistate reviews, including physician dispensing, non-resident pharmacy and dme licensing, patient education, orthotic licensing, pharmacy change of ownership requirements, drug pedigree requirements, internet pharmacy, pharmacy record retention, pharmacy electronic record requirements, auto-refill programs, automated dispensing, and physician dispensing.

Central Fill Pharmacy: Represented a pharmacy and hospital on central fill pharmacy declaratory statements.

Prescription Drug Wholesalers: Represented prescription drug wholesalers on a variety of issues related to Track and Trace, pill mills, authentication, background checks, purchases from unauthorized sources, license denials, and other Department of Health licensing, contract, and enforcement issues.

Group Purchasing: Represented one of the largest pharmacy group purchasing organizations in the country.

Policies and Procedures: Represented client in preparing policies and procedures for a chain pharmacy warehouse.

Drug Returns: Represented client on amendment of Department of Health rule allowing returns of drugs by affiliated group pharmacies to the chain pharmacy warehouse.

Entity Restructuring: Represented a pharmacy group purchasing organization in Virginia, Maryland, and Washington, D.C. Provided legal advice and assistance on restructuring the entity to operate as a chain pharmacy and as a third-party pharmacy network, including advice on compliance with Department of Justice and Federal Trade Commission Health Care Guidelines.

Group Purchasing Formation: Represented a Pennsylvania pharmacy association in forming a pharmacy group purchasing organization and advice on forming a third party pharmacy network.

Drug Distribution: Represented three hospital systems on drug distribution issues.

Permitting: Represented pharmacy research company on intent to deny of Florida Department of Health permits including: (1) prescription drug manufacturer; (2) over-the-counter drug manufacturer; (3) prescription drug repackager, (4) device manufacturer, and (5) cosmetic manufacturer.

Medical Device Compliance: Represented a medical device distributor on issues relating to FDA's requirements for medical devices.

Denial of Permits: Represented an international medical device manufacturer on the denial of permits for two medical device manufacturing facilities.

Licensing: Represented numerous medical oxygen retailers and compressed gas wholesalers on obtaining licenses from the Florida Department of Health.

Dispensing Issues: Represented numerous physician practices and physician dispensing companies on dispensing practitioner issues.

Medicare Reimbursement: Represented DME dealers, IDTFs, and physicians on Medicare reimbursement and fair hearings.

Mental Health Center: Represented a regional mental health center on Medicaid, pharmacy, licensing, and enforcement issues.

Regional Health Information Network: Represented a regional health information network on structural, Florida patient privacy, and HIPAA issues.

Medicaid Audits: Represented developmental disability providers on Medicaid audits.

Corporate Restructuring License Counsel: Represented national compressed medical gas company licensed as a medical gas manufacturer, wholesaler and prescription medical oxygen dealer on regulatory issues related to corporate restructuring causing a change to the licensed entity. The representation involved coordinating and trouble-shooting change of ownership license applications filed before the state Boards of Pharmacy and state drugs, devices, and cosmetics programs in 5 states involving over

100 licensed locations and approximately 200 licenses and registrations.

Bid Protests: Represented clients in handling bid protests and other procurement issues involving RFPs, ITBs, ITNs, and RFQs. In addition to these bid protests, routinely advise clients on issues relating to state and local government procurement and bidding issues.

Challenging Terms and Conditions: Represented clients in challenging the terms and conditions of the RFP for Jacksonville law enforcement radio and telecommunication services. *Harris Communications, Inc. vs. City of Jacksonville*

Challenging Results: Represented clients in bid protest challenging DBPR's determination that PSI, Inc.'s bid for computer based testing services was non-responsive. *PSI, Inc. vs. DBPR*

Challenging Results: Represented client in challenge to the results of bid protest. *Allegiance Security vs. Hillsborough County*

Defending Award: Represented client in defense of Department of Corrections' award of pharmacy services RFP to Maxor, Inc.

Challenging Finding: Represented client in challenge to finding that Auxis, Inc. was non-responsive. *Auxis, Inc. vs. DMS*

Defending Award: Represented client in defense of award of E-Rate Telephone Services to PaeTec Communications, Inc. *Verizon, Inc. vs. Hillsborough County School District and PaeTec Communications, Inc.*

Defending Award: Represented client in challenge by Intervenor, Honeywell, Inc. to the City's award of the Demand Side Energy Program to Nexant, Inc. *Honeywell, Inc. vs. City of Tallahassee and Nexant, Inc.*

Defending Award: Represented client in defense of Medicaid AIDS disease management program competitive bid. *AIDS Healthcare Foundation Disease Management of Florida, Inc. v. Agency For Health Care Administration* (Specialty Disease Management Services, Inc., Intervenor)

Challenging Result: Represented client in bid protest challenging the second award of competitive bid of Medicaid Pharmacy Hemophilia Disease Management Program. *Hemophilia Health Services, Inc. v. Agency for Health Care Administration* (Hemophilia of The Sunshine State And Caremark, Inc., Intervenor)

Challenging Result: Represented client in bid protest challenging the first award of competitive bid of Medicaid Pharmacy Hemophilia Disease Management Program. *Hemophilia Health Services, Inc. v. Agency for Health Care Administration and Caremark, Inc.*

Challenging Result: Represented client in bid protest brought against award of examination services by Department of Insurance. *Assessment Systems, Inc. v. Department of Insurance* (Experior Assessments, LLC, Intervenor)

Challenging Result: Represented client in bid protest of City of Tallahassee's decision to reject all bids for fire engine and equipment after negotiation with the winning bidder. *E-One, Inc. vs. City of Tallahassee.*

Challenging Result: Represented client in bid protest of Department of Management Services' decision to not award a carpet manufacturer under an invitation to negotiate for carpet and flooring services for state government buildings. *Milliken Services, LLC vs. Florida Department of Management Services*.

Published Work and Lectures

- [Health Law Rx Blog, Contributor](#)
- The Florida Bar's Health Law Section's Annual Advanced Health Law Topics and Certification Review, Speaker, "Pharmacy & FDA Law, Drug Distribution & Medical Marijuana," March 14, 2025
- Florida Pharmacy Association Webinar, Regulatory Excellence: The Future of Pharmacy Law in Florida, Speaker, "Medicaid and Commercial Audits: Navigating Compliance, Risk, and Regulatory Challenges in Pharmacy," December 7, 2024
- NASP 2024 Annual Meeting & Expo, Speaker, "Patient Copayments: Collection, Waiver, and Patient Assistance Programs," October 6, 2024
- The Florida Bar's Health Law Section's Annual Advanced Health Law Topics and Certification Review, Speaker, "Pharmacy & FDA Law, Drug Distribution & Medical Marijuana," March 8, 2024
- American Society for Pharmacy Law, 34th Annual Developments in Pharmacy Law Seminar, Speaker, "Establishing a Legally Compliant Referral Network," November 3, 2023
- Akerman LLP, Co-Author, "Florida's Prescription Drug Reform Act (PBM Legislation): What's in it for Florida Pharmacies?" July 27, 2023
- The Florida Bar's Health Law Section's Advanced Health Law Topics and Certification Review 2023, Speaker, "Licensure/Certification & Accreditation/CON," and "Provider Regulation/Institutional Operations," March 9, 2023
- Thompson Reuters West LegalEdcenter, Webinar, Speaker, "The Evolving Challenges of Providing Healthcare in a Post-*Dobbs* America," December 8, 2022
- National Association Specialty Pharmacies (NASP) 2022 Annual Meeting & Expo, Speaker, "Establishing a Legally Compliant Referral Network," September 19, 2022
- The Florida Bar, Advanced Health Law Topics and Certification Review, Speaker, "Licensure/Certification & Accreditation/Certificate of Need," and "Provider Regulation/Institutional Operations," March 11, 2022
- The Florida Bar, Advanced Health Law Topics and Certification Review, Speaker, "Licensure/Certification & Accreditation/Certificate of Need," March 12, 2021
- Florida Pharmacy Association, Law and Regulatory Conference, Speaker, "Special Topics in Pharmacy: Drug Import Programs and HIPAA Issues," January 25, 2020
- National Association of Specialty Pharmacy (NASP), 7th Annual Meeting and Expo, Panelist, "General Regulatory General Regulatory (Pharmacy Law, 340B, and Privacy Update)," September 12, 2019
- The Florida Bar, Advanced Health Law Topics and Certification Review, Speaker, "Licensure / Certification & Accreditation / Certificate of Need," March 8, 2018
- The Florida Bar, Health Law Section, Advanced Health Law Topics and Certification Review 2017, Speaker, "Licensure / Certification & Accreditation / CON," March 3, 2017

- Health Law Conference, Panelist, “Managing Patient Pain: Keeping Health Care Professionals Out of Legal Trouble,” January 25, 2016
- The Florida Bar, Health Law Section, Advanced Health Law Topics and Certification Review 2016, Speaker, “Provider Regulation/Institutional Operations: Licensure, Certification & Accreditation,” March 5, 2016
- American Pharmacists Association (APhA), Speaker, “A Prescription for Negligence,” March 31, 2014
- Florida Medical Marijuana Treatment Center (MMTC), Presenter, “Florida Pharmacy Law - A Blueprint for the Regulation of Medical Marijuana Under Article X, Section 29,” May 24, 2014
- International Academy of Compounding Pharmacists (IACP), Speaker, “Pharmacy Malpractice,” May 17 - 20, 2014
- West LegalEdcenter, Speaker, “Compounding Pharmacies: Hashing Out the New Laws,” March 13, 2014
- Rx Ipsa Loquitur, American Society for Pharmacy Law, Author, “Implications Likely for Pharmacies in Recent Federal Appeals Court Decision which sides with HIPAA over Florida law in “Catch 22” Case Over the Release of Deceased Patient Records by Nursing Homes,” June 2013
- Florida Pharmacy Association, Regulatory and Law Conference Speaker, “Pharmacy Audits,” December 3-4, 2012
- Florida Pharmacy Association, Speaker, “Pharmacy Audits- Unstacking the Deck!” April 21, 2013
- Akerman Seminar, Speaker, “HIPAA Privacy and Security Regulations 101,” October 2012
- Florida Pharmacy Association, Regulatory and Law Conference, Speaker, “Federal and State Laws that Protect Patient Information: Get Hip to HIPAA” and “Navigating the Rough Waters of the Federal Controlled Substances Act: A Review of the Code of Federal Regulations,” January 28, 2012
- Food Marketing Institute, Speaker, “Retail Pharmacy Issues and Health and Wellness,” June 5, 2012

Affiliations

- American Society for Pharmacy Law, Treasurer and Board Member, 2020–2024; Board Member, 2016–2020
- The Florida Bar, Health Law Section, Member
- American Health Lawyer’s Association, Member
- Chinese Children Adoption International Florida Advisory Council, Past Vice President, 2004–2005
- Tallahassee Families with Asian Children, Founding Board Member; Past President, 1999–2001
- The Florida Bar, Environmental and Land Use Section, Former Member
- The Florida Bar, Continuing Legal Education Committee, Past Section Representative, 1986–1988
- Legal Services of North Florida, Inc., Past President, 2003–2005; Board Member, 1996–2017
- Tallahassee Bar Association, Member

Honors and Distinctions

- Board Certified in Health Law, The Florida Bar Board of Specialization and Education
- *Best Lawyers*, 2013-2025, Listed in Florida for FDA Law, Health Care Law, Administrative/Regulatory Law

- *Chambers USA*, 2021-2024, 2009-2012, Ranked in Florida for Healthcare
- *Super Lawyers Magazine*, 2014-2024, 2009, Listed in Florida for Healthcare and Administrative Law
- *Florida Trend's* Legal Elite, 2008, Listed for Health Care Law
- The Florida Bar, 2005, Recipient of President's Pro Bono Service Award
- The Florida Bar 1988, Recipient of the Judy Florence Memorial Outstanding Service Award