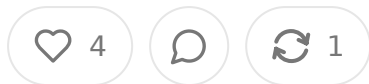


The \$1.8B Ozempic Middleman and What It Actually Means for Health Tec

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Abstract

- Matthew Gallagher, 41, built Medvi with \$20,000, 2 months, and 12+ AI tools; 1 company hit \$401M in 2025 revenue with 250,000 customers and a 16.2% net margin (\$65M profit)
- On track for \$1.8B in 2026 sales with exactly 2 employees (him and his brother Elliot)
- Medvi is a GLP-1 telehealth platform: it owns the customer relationship and outsources all clinical infrastructure to OpenLoop Health and CareGLP-affiliated providers
- Comparison: Hims and Hers did \$2.4B revenue in 2025 with 2,442 employees at a net margin; Medvi is running 3x the margin at 1/1,000th the headcount
- Regulatory exposure is real: FDA declared semaglutide shortage resolved Feb 2 has since issued 30+ warning letters to telehealth companies including Medvi, D referrals are active
- Sam Altman's 2024 prediction of a one-person billion-dollar company has effectively arrived, just not in the form anyone expected
- The deeper story is not about Medvi specifically, it is about what the infrastructure layer (OpenLoop, CareValidate) now represents and what AI-enabled capital efficiency means for health tech investing

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The Setup: What Medvi Actually Is

Before getting into what makes the Medvi story interesting, it is worth being precise about what the company actually does, because a lot of the hot takes circulating are reacting to a caricature. Medvi is not a healthcare company in any meaningful clinical sense. Per its own terms of use, it explicitly is not a healthcare provider and does not provide healthcare services. What it is: a consumer-facing tech platform that owns the customer acquisition funnel, the checkout experience, the branding, and the CRM layer for GLP-1 telehealth. The actual medicine, the licensed physicians, the prescription processing, the pharmacy fulfillment, and the regulatory compliance sit at OpenLoop Health and a set of affiliated professional corporations called CareGLP. Medvi rents all of that by the transaction.

This architecture is not new. It is the standard three-entity telehealth model that emerged partly as a response to corporate practice of medicine doctrine, which prohibits non-physician entities from employing physicians and directing their medical judgment in most states. The management services organization structure where a tech company owns the brand and patient relationship and a separately owned physician group handles the clinical side, has been around for years. What

new is that Gallagher built the consumer-facing layer, which is the part with all margin, almost entirely with AI tools rather than a dev team, a content team, and ops team.

That distinction matters for how you evaluate the story. If you are reading it as “one guy build a hospital,” that is wrong and a little dangerous. If you are reading “AI compressed the cost of building and operating the consumer brand layer of a high-demand telehealth vertical to near zero,” that is closer to accurate and is also worth thinking carefully about.

The Numbers That Are Hard to Ignore

The financials are genuinely remarkable and the NYT verified them, so they deserve to be taken seriously rather than dismissed as startup founder mythology. Medvi launched in September 2024. It got 300 customers in month one, 1,300 by month two, and then just kept compounding. In 2025, its first full calendar year, it did \$401 million in revenue on 250,000 customers. Net margin was 16.2%, which works out to roughly \$65 million in profit. By April 2026 it is generating over \$3 million per customer and is tracking toward \$1.8 billion in annual revenue for the year.

For context, Hims and Hers, which spent years and hundreds of millions building physician networks, pharmacy relationships, brand infrastructure, and a real operations organization, did \$2.4 billion in revenue in 2025 with 2,442 employees and a 5.5% margin. Medvi is approaching similar revenue scale with 2 employees and running margins that are roughly triple. The revenue-per-employee comparison is somewhat in the range of \$900 million per head for Medvi versus about \$1 million per head for Hims. That gap is hard to look at straight.

The men's health expansion Gallagher launched in February 2026, covering erectile dysfunction treatments, signed 50,000 customers in its first month. Meal delivery came online in March. Women's health, hair growth, and skincare are queued. The playbook is clear: find a high-demand, high-margin consumer health vertical with existing compounding infrastructure and repeatable prescription protocols, point

AI acquisition machine at it, and scale. The startup costs for each new vertical are close to zero given the tooling is already in place.

The AI Stack Behind It

The specific tooling Gallagher used is worth walking through because it maps reasonably well to the functional departments he effectively replaced. ChatGPT, Claude, and Grok handled code generation for the platform itself. Midjourney and Runway generated ad creative, which in a paid media business is a perpetual resinsink because you are always testing new hooks and killing losers fast. Customer service ran on AI, which in a telehealth adjacent platform is a significant cost center if you staff it with humans. He built internal dashboards and performance analysis systems on top of the same AI stack.

What he did not build: the clinical layer, the compliance layer, the pharmacy infrastructure, or the physician network. He did not need to. OpenLoop had already spent years and real capital building a plug-and-play version of all of that. Gallagher essentially built a very good storefront on top of an existing warehouse and logistics operation. The warehouse and logistics are the hard part of healthcare. He correctly assessed that he did not need to own them to extract value from them, and that the consumer acquisition and retention layer, which is where almost all the margin lies in direct-to-consumer health, was the part AI could help him rebuild from scratch under \$20,000.

The coding specifically is worth flagging for a technical audience. What Gallagher appears to have done is vibe coding at scale, using LLMs to generate functional code without being a trained software engineer. This is not a new phenomenon but Midjourney is probably the most financially documented example of what happens when you apply it to a live production business rather than a side project. The codebase is presumably not particularly elegant, and there are real questions about what happens to a system built this way as it scales toward \$1.8 billion in annual transaction volume. Tech debt at that kind of revenue scale has a habit of becoming a real emergency at the worst possible moment.

Why the Regulatory Picture Is Scarier Than the Headlines Suggest

The growth story is impressive. The regulatory exposure underneath it is genuinely serious and the cheerleading coverage has mostly underweighted it. Here is the situation as of April 2026.

The FDA declared the semaglutide drug shortage resolved in February 2025. Under the Federal Food, Drug, and Cosmetic Act, compounding pharmacies are generally prohibited from producing drugs that are essentially copies of commercially available FDA-approved products. The shortage exception, which was the legal foundation of the entire compounded GLP-1 market that companies like Medvi operate in, was effectively closed when the shortage was declared resolved. What followed was a period of regulatory whiplash where litigation challenging the shortage resolution created some legal ambiguity, but the direction of travel was clear.

By early 2026, the FDA had issued more than 30 warning letters to telehealth companies marketing compounded GLP-1s, and Medvi was specifically named as one of the recipients. STAT News analysis found that among more than 70 telehealth companies warned in recent months, at least 30% have publicly stated affiliation with just four nationwide medical groups, including OpenLoop, the same OpenLoop powering Medvi's clinical infrastructure. The DOJ has received enforcement referrals. A September 2025 executive order specifically targeted DTC advertising practices in this space, which accelerated enforcement activity. The FDA has issued warning letters at a pace that, per pharmaceutical industry analysis, has exceeded the cumulative total of the prior decade in just six months.

Gallagher has acknowledged the vulnerability directly. Medvi holds no proprietary technology, no licensed physician network, no pharmacy infrastructure, and no exclusive supplier relationships. The 2026 revenue projection assumes the compounded GLP-1 window stays open. It may not, and if enforcement tightens further, the revenue does not gradually decline, it potentially stops abruptly. The men's health and women's health pivots look a lot smarter in this context. They are not just expansion, they are a hedge against a single-product regulatory cliff.

For investors evaluating anything in the compounded GLP-1 adjacent space, the honest question is not whether this business is impressive (it is) but whether it is investable given the regulatory exposure profile. A business that is highly profitable but dependent on a legal gray area that the FDA is actively narrowing is not a standard growth investment. It is something closer to a trade with a potentially large stop-loss.

The Infrastructure Play Nobody Is Talking About

The piece of the Medvi story that has gotten the least attention and probably deserves the most is what it reveals about OpenLoop and CareValidate as platform businesses. These are the companies that actually own the clinical infrastructure Medvi rents. The fact that a two-person shop with \$20,000 in startup capital was able to build a \$1.8 billion revenue business on top of their infrastructure is not just interesting; it says a lot about what Medvi is. It is a profound proof point about what OpenLoop has actually built.

OpenLoop provides licensed physician networks, prescription processing, pharmaceutical fulfillment, shipping logistics, and regulatory compliance as a service. That is an extraordinarily hard set of capabilities to assemble. The regulatory complexity alone, spanning licensure across 50 states, controlled substance compliance, pharmacy relationships, and clinical quality oversight, represents years of work and real capital investment. Gallagher correctly identified that he did not need to replicate any of that because someone had already done it and was willing to wholesale it to him.

The interesting investment thesis is therefore not in the Medvis of the world, which are consumer brands with real regulatory risk and no proprietary clinical moat. It is in the OpenLoops and CareValidates, which are now demonstrably capable of powering a \$1.8 billion revenue consumer health business. They are the picks-and-shovels of AI-enabled telehealth. Any operator with marketing fluency and an OpenLoop account can theoretically replicate what Gallagher did. That makes OpenLoop a very interesting acquisition target for a larger platform that wants to own the

infrastructure layer, or a potential competitor if they decide to build their own branded consumer layer rather than wholesale it to hundreds of Gallaghers simultaneously. The strategic optionality there is real.

For the health tech ecosystem more broadly, this pattern, where clinical infrastructure gets commoditized and packaged as API-accessible services, is going to repeat itself well beyond GLP-1. Behavioral health, chronic disease management, post-acute coordination, and diagnostics all have versions of this dynamic emerging. The companies building the clinical rails quietly while consumer brands get all the press are probably undervalued right now relative to where this pattern takes the market over the next five years.

What This Means for Health Tech Investors

The Medvi story forces some genuinely uncomfortable recalibrations for anyone thinking about capital efficiency and moat construction in health tech. The traditional venture framework for healthcare has always included a heavy premium on proprietary clinical relationships, regulatory expertise, and physician networks as sources of defensibility. The argument was that these were expensive and slow to build, which created natural barriers to competition. Medvi is a fairly direct challenge to that logic, at least in the consumer-facing layer.

The consumer health brand layer, the part that captures customer attention and acquisition, can now be built with AI tools, a small budget, and strong marketing instincts. That is a real decompression of startup costs in a part of the stack that used to require meaningful seed capital for engineering alone. The implications for angel investing in particular are significant. A pre-seed check into a consumer health company that has correctly identified high-demand clinical infrastructure it can build on top of is not the same risk profile it was three years ago. The question is no longer primarily about whether the founder can build the product. It is about whether regulatory and market timing is right, whether the infrastructure partner relationship is defensible enough to prevent commoditization, and whether the acquisition

economics hold up as AI-generated ad creative becomes ubiquitous and therefore differentiating.

That last point matters a lot. If anyone can spin up an OpenLoop-powered consumer health brand with AI tools for \$20,000, then the advantage accrues to whoever has the best brand, the best customer retention, and the best product expansion velocity. The acquisition cost advantage Gallagher had in 2024 and 2025, in part because AI creative was still somewhat novel, will compress as more operators adopt the same tools. At \$1.8 billion in projected 2026 revenue, the interesting question is not whether Medvi got there but whether it can defend the position it is in as the playbook becomes table stakes.

For investors in the clinical infrastructure layer, Medvi is a strong validation even for companies building compliant, multi-state, plug-and-play clinical networks just as a very public proof point that their infrastructure can support nearly \$2 billion in annual revenue. That should move valuations, and it should also prompt a more serious strategic conversation about whether these platforms want to remain pure-play infrastructure wholesalers or whether they want to own more of the value chain themselves.

Sam Altman Was Right, Just Not How He Imagined

Altman made the prediction in early 2024 that AI would eventually enable a one person billion-dollar company. Most of the Silicon Valley commentary at the time assumed it would be something deeply technical, an AI company with a novel model architecture, a biotech discovery platform, something that required PhD-level expertise and replaced institutional research capabilities. Instead the first candidate was a guy from LA who grew up in a trailer park, spent \$20,000 on AI subscriptions, and pointed a very clean customer acquisition funnel at the most in-demand consumer health vertical of the decade.

The lessons there are not particularly flattering to the assumption that the AI-era company of the future would be complicated. What Gallagher actually built is a

marketing operation with extremely low overhead and a very good nose for consumer demand. The AI did not make him smart about healthcare. It made building the software, generating the ads, and staffing the customer service queue cheap enough that someone without a technical background or healthcare experience could operate all of it without employees. The insight about which market to enter, the GLP-1 weight loss space with its desperate customer base and existing compounding infrastructure, was just good old-fashioned market selection. AI had very little to do with it.

That reframing is useful for health tech investors and founders thinking about the enabled company thesis more broadly. The tools do compress the cost of building. They do not compress the cost of being wrong about the market. Gallagher picked a market with genuinely enormous demand, a high willingness to pay, existing clinical infrastructure, and a favorable regulatory window that he correctly (if perhaps late) caught early. The AI stack let him operate it lean. The market insight is what made it worth \$1.8 billion. The two-person team is the headline but it is not actually the story. The story is market timing, infrastructure leverage, and aggressive customer acquisition in a space where the tailwind is strong enough to make a lot of operational shortcuts invisible until they are not.

The regulatory cloud still hanging over the compounded GLP-1 market means that the specific story may not have the ending the current growth numbers suggest. But the structural argument it makes about AI-enabled capital efficiency in consumer health and about the investment value sitting inside clinical infrastructure platforms, is going to play out across verticals for years. Founders and investors who treat Merck as a freak occurrence and move on are probably missing the more durable lesson.



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