

**Napoli conversation notes – 9/12/2013:**

SOM Resource – Will Simmons

- Compliance Auditor/Investigator, DEA Affairs
  - Legacy Actavis, with former regulatory responsibilities in Elizabeth
  - Apparent investigative, military and regulatory background
- Simmons is willing to answer questions and review the SOM process at any time; MRC to make appointment for late September or October
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Actual SOM system status

- In the final stages of construction; to be completed by end of 2013
  - Delay attributed to Watson/Actavis integration and now WC integration
  - Using Cegedim system and recently had presentation by ValuCentric software system, which is likely to be used
  - System has moved from a threshold based system to an algorithm, that incorporates products from Watson and from legacy Actavis
- Has sent customer agreements out and had signed
  - Related to implementation of SOM and flagging of suspicious orders or orders of interest
  - Napoli to send copy
- Also sent out customer questionnaires regarding distributors customer population demographics, supplier demographics (one or more than one supplier, etc.), ordering needs and status and the like
  - Napoli to send
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External meetings

- Napoli to attend IWG meeting on October 8 in Chicago
- Mentioned a one-day DEA conference in DC on October 22

