

# Memorandum



Subject

Distributor Briefing with Actavis Elizabeth, LLC  
(RK0146806), on September 12, 2012

(DFN:601.04.2)

Date

NOV 05 2012

To

Joseph T. Rannazzisi  
Deputy Assistant Administrator  
Office of Diversion Control

From

*Barbara J. Boockholdt*  
Barbara J. Boockholdt, Chief  
Regulatory Section, ODG  
Office of Diversion Control

On September 12, 2012, a meeting was held in Arlington, Virginia at the Drug Enforcement Administration (DEA) Headquarters between DEA and Actavis Elizabeth, LLC (Actavis). Representing Actavis were: Nancy Baran, Director, Customer Service, Jason Chung, DEA Manager, John S. Kaldes, Senior Director Engineering & EHS, Michael R. Clarke, Ethics & Compliance Officer, Americas, and Doug Plassche, Managing Director, NJ Solid Oral Dose (SOD). Representing DEA were: Barbara J. Boockholdt, Chief, Regulatory Section; Staff Coordinator (SC) Leonard Levin, Regulatory Section; Dedra Curteman, Office of Chief Counsel, Jason Hedges, Office of Chief Counsel; Christine Sannerud, Chief, Quota Section; Stacy Harper-Avilla, Chief, Quota Unit; GS Andrew Breiner, and D/I Michael Smilek, both from the Newark Division Office. The purpose of the meeting was to address the manufacturing and distribution practices of controlled substances by Actavis. SC Levin stated he would only concentrate on oxycodone 15mg and 30mg tablets for the purposes of this meeting. Actavis holds the following DEA Registrations: RK0146806 (Manufacturer, NJ), R0146818 (Distributor, NJ), RB0185579 (Manufacturer, NC), RA0231062 (Manufacturer, FL), RA0419552 (Manufacturer, NJ), RA0419540 (Distributor, NJ), and RA0395675 (Manufacturer, NJ).

SC Levin opened the meeting by stating its purpose was both educational and informative. SC Levin stated he would discuss Actavis' responsibilities under the Controlled Substances Act (CSA), their suspicious order monitoring system, their procedures concerning due diligence, knowing their customers, who their customers sell to, and graphs depicting the pharmacies where their products were ultimately dispensed from. SC Levin stated he would be primarily focusing on the distribution of oxycodone 15mg and 30mg tablets by Actavis. SC Levin asked for a representative from Actavis to talk briefly about the firm, their product line, their suspicious order monitoring system and to whom they distribute. Ms. Baran spoke on behalf of Actavis. Ms. Baran stated that Actavis manufactures non-controlled and controlled substances from their locations in New Jersey, North Carolina and Florida. Actavis' corporate offices are located in New Jersey. Ms. Baran stated that as of November 1, 2012, Watson Pharmaceuticals will acquire Actavis and the firm will have a new name. Ms. Baran stated both Actavis and Watson will be applying for new DEA registrations. Watson was not invited to this meeting per Actavis because the acquisition has not yet taken place. Ms. Baran stated Actavis sells some products directly to distributors, but the bulk of their finished products are sent to UPS Supply Chain, which serves as a fulfillment center

PLAINTIFFS TRIAL  
EXHIBIT

**P-19397\_00001**

for orders placed with Actavis. Ms. Baran stated Actavis remains the owner of the controlled substances while in the possession of UPS Supply Chain. Ms. Baran stated that UPS Supply Chain has their own suspicious order monitoring system. Almost all of Actavis' controlled substances are sent to the UPS Supply Chain location in Louisville, KY. Actavis ships the order to UPS Supply Chain for processing and distribution. Actavis is the owner of the inventory, not UPS Supply Chain. UPS Supply Chain uses their own DEA registration and reports purchases and sales directly to ARCOS. Ms. Baran explained their charge back system. The system enables Actavis to see who their customers are selling their products to and what they are purchasing. Ms. Baran stated that Actavis is just beginning to review their sales through the charge back system. Ms. Baran stated she has visited UPS Supply Chain and been able to review their suspicious monitoring system. UPS Supply Chain has a staff which monitors any suspicious orders of controlled substances. Value Centric is a firm who stores sales data for Actavis which they can review. Recently, Ms. Baran has gone out to visit their large volume customers, such as Cardinal, McKesson and AmerisourceBergen. SC Levin mentioned to Ms. Baran the significance of "Knowing Your Customers". SC Levin stated that the United States (U.S.) consumes more legitimately manufactured controlled drugs than any other country. SC Levin mentioned that 97 percent of hydrocodone that is manufactured is prescribed and dispensed in the United States. SC Levin explained the dramatic increase of prescription drug abuse, which has increased by 400 percent over the past 10 years. SC Levin stated that today more people are abusing prescription medication than are abusing illicit drugs. The abuse of prescription drugs has become a national epidemic.

SC Levin presented a PowerPoint presentation exemplifying the common characteristics and issues associated with the distribution and manufacturing practices by manufacturers and distributors of controlled substances. SC Levin stressed the importance of a manufacturer's due diligence requirements, knowing one's customers, and the detection of suspicious orders. Specifically reviewed were the following:

- Supreme Court Cases and Immediate Suspension Orders
- Closed System of controlled substance distribution
- Establishing the medical necessity for a prescription and/or a distribution to be legal
- The DEA Internet Policy and the Ryan Haight Act
- Policies published by the American Medical Association (AMA) and the Federation of State Medical Boards (FSMB)
- Review of Suspicious Order requirements of Title 21, Code of Federal Regulations
- Knowing one's customer
- Theft and loss reporting
- Recent News Articles regarding actions taken against CVS pharmacies, Cardinal and Walgreens
- System to insure the address, controlled substance schedules and expiration date of customers' DEA registrations prior to shipping them controlled substances
- Recent actions taken by the DEA to suspend or revoke controlled substance registrations of distributors and pharmacies that continue to divert controlled substances into the illicit market

At the conclusion of the PowerPoint Presentation, SC Levin presented graphs documenting the distribution of oxycodone 15mg and 30mg tablets by Actavis Elizabeth, LLC. These distributions were derived from ARCOS reports submitted by Actavis under specific NDC numbers. The graphs revealed a dramatic increase in the sale of oxycodone 15mg and 30mg tablets from 2010 to present with the vast majority being distributed to Florida. The graphs did show a decrease in the amounts of oxycodone distributed in the past six months. SC Levin attributed the decrease to actions taken by DEA in Florida,

the Florida prescription monitoring program, administrative action taken by DEA against registrants and meetings such as this one. Chief Boockholdt explained that the manufacturer that produces oxycodone is just as responsible as the distributor and pharmacy for ensuring that these drugs do not end up in the wrong hands. SC Levin thoroughly discussed the problems associated with pain management clinics in Florida, which has directly attributed to the abuse and the diversion of oxycodone. Chief Boockholdt stated that addicts are coming from around the country to Florida and are specifically seeking oxycodone 15mg and 30mg tablets. Chief Boockholdt stated that in Florida eleven people per day are dying from oxycodone overdoses and seven babies are born each day addicted to opiates. SC Levin discussed the red flags associated with physicians prescribing at pain management clinics and the pharmacies who filled the prescriptions, such as, controlled versus non-controlled drugs, trends in purchasing, types of drugs purchased, quantity of drugs purchased, hours of operation, mainly cash customers, etc. Chief Boockholdt stated that ARCOS data revealed the [REDACTED] was distributing very large quantities of Actavis oxycodone 15mg and 30mg to numerous pharmacies in Florida. Some of the pharmacies had purchased well in excess of a million dosage units per year. This is an obvious concern to DEA and must be addressed by Actavis.

The graphs were broken down by year and included 2010, 2011, and the first six months of 2012. The graphs revealed that Actavis' oxycodone 15mg. and 30mg tablets are distributed throughout the country, but more is distributed in Florida than almost all of the other states combined. The problem is especially bad in South Florida, specifically Miami Dade, Broward and Palm Beach Counties. Chief Boockholdt stated that Florida's prescription drug laws have traditionally been very lax and because of that and the influx of pain management clinics oxycodone sales went out of control. Chief Boockholdt mentioned that because of the amount of oxycodone prescriptions being written, Florida, specifically South Florida has more pending pharmacy applications than all other states combined. Statistics are now showing this problem is spreading north into Georgia, Tennessee, Kentucky, Ohio and West Virginia. SC Levin stated one of the purposes of this meeting is to bring the wholesaler or manufacturer on board to be part of the solution, rather than contribute to the problem.

SC Levin showed graphs of oxycodone shipped by UPS Supply Chain to the distributors and to the distributors' customers. SC Levin advised Ms. Baran that Actavis should send someone from their compliance team to visit pharmacies who were receiving their products in south Florida, in order for them to witness the long lines at pain clinics, out of state license plates, questionable clients, security guard(s) in the parking lots, and signs stating cash payment only. SC Levin and Chief Boockholdt stressed to Ms. Baran and the other Actavis representatives to get to know their customers, visit distribution sites, visit customers of those distributors, check on customers' suspicious order monitoring systems, review due diligence files, and obtain printouts of pharmacies or practitioners who are receiving Actavis products.

Ms. Baran stated Actavis has only recently begun looking at the pharmacies that purchase their products and wants to be involved in working to resolve this problem. SC Levin stated that if their customers refused to provide them with sales information Actavis should consider cutting them off. Chief Boockholdt suggested Actavis determine the percentage of their products being shipped into Florida. SC Levin inquired about the two NDC numbers for both oxycodone 15mg and 30mg tablets in 2011. Ms. Baran stated that two of Actavis NDC numbers was terminated in 2011 and replaced by the two new ones. SC Levin again mentioned the [REDACTED]. Ms. Baran stated that [REDACTED] distribution centers purchase oxycodone from Actavis. SC Levin suggested representatives of Actavis travel to some of the distribution sites, especially the one in [REDACTED], to review their suspicious order monitoring systems. A review of [REDACTED] pharmacies purchases of Actavis products is important. The charts shown at this briefing revealed that some [REDACTED]

pharmacies were purchasing in excess of 20 times the national average of oxycodone. SC Levin pointed out that [REDACTED] in Delaware are owned by [REDACTED] and dispense large quantities of oxycodone. Chief Boockholdt mentioned that any manufacturer's quota request is based on anticipated need and the fact that the majority of prescriptions dispensed in Florida were not legitimate show that Actavis' quota may be too high. SC Levin asked the representatives from Actavis to take serious look at their quota request, review their suspicious order monitoring system, visit their customers to review their suspicious order monitoring systems as well as their due diligence files, ask to see their customers' top customers for Actavis products, and contact their local DEA Office with any questions or issues. Ms. Baran stated that their sales force has been informed to keep management abreast of what is going on in the field. SC Levin mentioned that sales people are generally on commission and may not be objective when it comes to their accounts purchasing suspicious or unusual orders of controlled substances.

Ms. Baran said that Actavis will do whatever it takes to remain in compliance with the CSA. Ms. Baran stated she will take this information back to Actavis corporate headquarters and begin thoroughly reviewing charge back information, as well as the other data bases. Ms. Baran stated Actavis Compliance personnel plan to visit more of Actavis' customers to review their due diligence records and suspicious order monitoring systems. Ms. Baran stated Actavis wants to ensure to the best of its ability that their products are being properly monitored by Actavis and their customers.

SC Levin explained that the purpose of this meeting was to inform, educate, provide pertinent ARCOS data, discuss national trends, and discuss the pain management epidemic in Florida involving oxycodone. DEA is seeking to partner with drug distributors and manufacturers in resolving this problem. SC Levin did state that if Actavis or any firm who had been briefed was found to have violated the CSA pertaining to what was discussed during the course of this meeting DEA could seek administrative or civil action to remedy the situation. Chief Boockholdt advised the representatives from Actavis that all employees who have access to controlled substances at Actavis should receive training similar to that provided at this meeting today.

SC Levin asked if there were any questions. There were none. The meeting between the Drug Enforcement Administration and Actavis Elizabeth, LLC was concluded.

Attachments:

1. PowerPoint presentation
2. Graphs of Actavis Elizabeth, LLC ARCOS sales/purchases

cc: GS Andrew Breiner, Newark Division Office

This presentation does not cover the totality of your obligations nor is it a substitute for your obligations as a DEA registrant under The Controlled Substances Act and its Regulations.

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The information presented should not be considered new information. The substance of this presentation has been previously available and communicated through The Controlled Substances Act, its Regulations, Federal Register Notices, DEA and sponsored conferences, correspondence from the DEA, releases from the popular press, in addition to the Registrant's own sales data.

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## Closed System

- The comprehensive Drug Abuse Prevention and Control Act of 1970, as amended in 1990 and 1994 created a system for the legitimate manufacturing, distribution, and prescribing/dispensing of controlled substances.
- Each registrant within this “closed system of distribution” has defined privileges and responsibilities in which they must operate.

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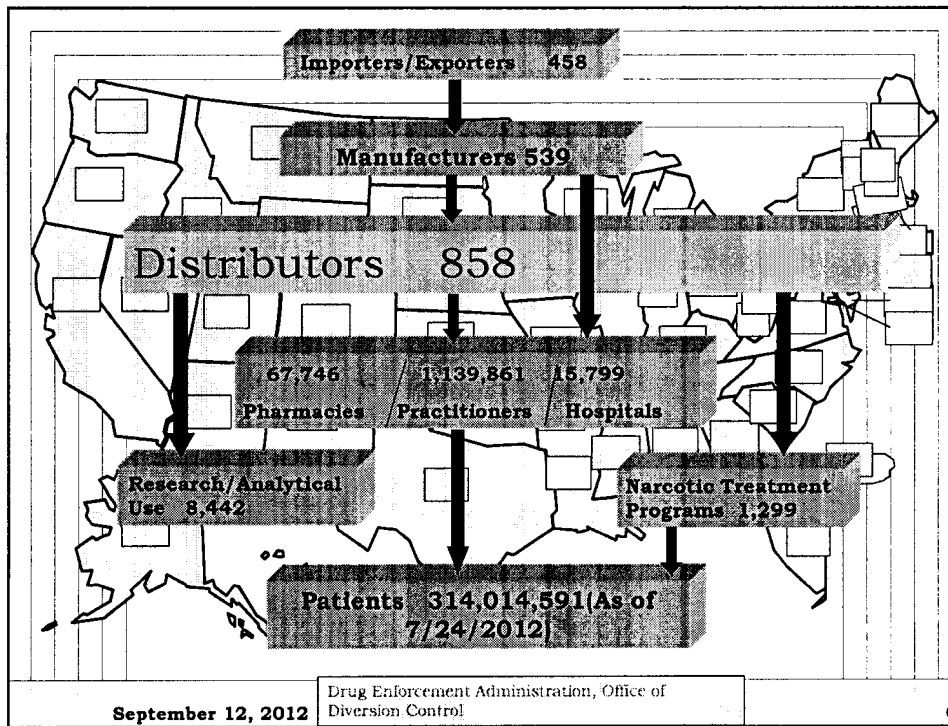
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## Closed System

- When a registrant fails to adhere to their responsibilities, those violations represent a danger to the public and jeopardize the “closed system of distribution”.
- DEA is responsible for the oversight and integrity of the system and to protect the public.

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**Supreme Court Cases**

- **Direct Sales Co, Inc. v. United States (1943)**
  - Mail order sales to doctor
  - Most sales were morphine
  - Increase in quantities purchased
  - Business practices attracted customers who were violating the law
  - Drugs have inherent susceptibility to harmful and illegal use

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**United States v. Moore (1975)**

- Usual course of professional practice
  - Patient with a Medical Complaint
  - History
  - Physical Examination
  - Nexus Between Complaint/History/Exam and Drug Prescribed

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**Distributor Responsibilities**

- 21 USC, Section 823
  - Is the registration in the public interest?

**Maintenance of Effective Controls**

- Against diversion of particular controlled substances into other than legitimate medical channels

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**Pharmacy Responsibilities:**

- 21 USC, 823
  - Compliance with applicable State, Federal, or local laws relating to controlled substances,
  - Such other conduct which may threaten the public health and safety
  
- 21 CFR, 1306.04(a):
  - A corresponding responsibility rests with the pharmacist who fills the prescription

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**Practitioner Responsibilities:**

- 21 USC 823
  - Compliance with applicable State, Federal, or local laws related to controlled substances
  - Such other conduct which may threaten the public health and safety
  
- 21 CFR 1306.04(a)
  - A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice

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## Ryan Haight Act

- MUST be approved prior to any online dispensing. ONLY a previously registered pharmacy who DEA approved with a modification of registration may be an online pharmacy
  
- A DEA registered pharmacy that is approved to conduct online dispensing MUST notify DEA and the state boards of pharmacy in all states in which they conduct business 30 days prior to offering a controlled substance to sell, deliver, distribute, or dispense

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## Ryan Haight Act

- An online pharmacy MUST comply with all state laws from which and to which they deliver, or dispense, or offer to deliver or dispense controlled substances by means of the Internet
  
- A VALID prescription for a controlled substance by means of the Internet MUST be for legitimate medical purpose and have at least one in-person medical examination by a practitioner authorized by DEA and respective State authorities to prescribe controlled substances in that controlled substance schedule

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- Pain Management  
Organizations have established guidelines which suggest treatment is not exclusive to the administering of controlled substances only
- There must be a balance between pain and addiction

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**Recognized Modalities for the Treatment of Pain:**

- Pharmacotherapy
- Psychosocial Interventions
- Rehabilitation Techniques
- Complementary & Alternative Medicine
- Implantable Devices & Surgical Interventions

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- Three Pain Management Associations recommend “Opioid Guidelines”
- Guidelines provide recommended procedures and best practices for a practitioner to implement
- Not an endorsement by the DEA. A guide for you to assess your customers.

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**21 CFR 1301.74**

- Requires that registrants design and operate a system to identify suspicious orders
  
- Report suspicious orders to DEA **when discovered**

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## Suspicious Orders

Reporting of a suspicious order to DEA does NOT relieve the distributor of the responsibility to maintain effective controls against diversion

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## Suspicious Orders

- DEA cannot advise a distributor if an order is legitimate or not.
  
- Distributor must determine which orders are suspicious and make their OWN decision to sell or not to sell

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**DUE DILIGENCE**

**“KNOW YOUR CUSTOMER”**

Prior to filling an order the distributor should review the following:

- Unusual frequency of order(s),\*
- Unusual size of order(s),\*
- Deviating substantially from a normal pattern \*

\* Mandated by 21 CFR, 1301.74(b)

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**DUE DILIGENCE**

- Range of Products Being Purchased,**
- Methods of Payment (cash, insurance, Medicaid),**
- Location and hours of operation,**
- % Controlled vs. % Non-Controlled,**
- Customer pick up at distributorship**

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## DUE DILIGENCE



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## Notifications

- Theft and Loss – Report immediately via on-line.
- Contact your local field office.
- ODGR – Regulatory Unit – (202) 307-7161
- ODG@USDOJ.GOV** – Notification of termination of customers for cause. (No explanation required.)

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**Southwood Pharmaceuticals, Inc.**

- 72 FR 36,487 (2007)
  - Revocation of Registration
  - Immediate Suspension Order
    - Failure to maintain effective controls against diversion
    - Supplied millions of dosage units of controlled substances to Internet pharmacies
    - Failure to exercise due diligence (21 USC 823)

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**Ladapo O. Shyngle, M.D.**

- 72 FR 6056 (2009)
  - Revocation of Application to renew registration
  - Dr. Shyngle prescribed C/S's via an Internet questionnaire and telephone interviews.
  - Prescribed over 500,000 d.u. to patients in 41 states.
  - Issued prescriptions primarily for hydrocodone.

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**Dale L. Taylor, M.D.**

- 72 FR E7-10622 (2007)
  - Revocation of registration.
  - Authorized prescriptions via the Internet, based solely on on-line questionnaire and telephone conversations.
  - Authorized 6,069 prescriptions to 1,098 patients in 46 different states.
  - 5,156 prescriptions were for hydrocodone and 526 were for alprazolam.

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**United Prescription Services**

- 72 FR 50397 (2007)
  - Immediate Suspension Order and revocation of registration.
  - United Prescription Services operated several Internet sites.
  - Between Oct 2005 - Jan 2006, distributed 1,808,693 d.u. More than 1,275,000 were written by one practitioner.
  - Mostly written for hydrocodone and alprazolam.

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**Patrick W. Stodola, M.D.**

- 74 FR 20727 (2009)
  - Revocation of Registration.
  - Authorized prescriptions based upon an on-line questionnaire and telephone conversations.
  - Prescriptions were for hydrocodone.
  - Prescriptions were in violation of state laws where the patients were having them filled.

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**Bob's Pharmacy & Diabetic Supplies**

- 74 FR 19599 (2009)
  - Immediate Suspension Order and Revocation of Registration.
  - Between Apr – Dec 2007, ordered 2.3 million dosage units of hydrocodone products.
  - Prescriptions were approved via an on-line questionnaire.

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## SUMMARY

- Prescriptions not written in the usual course of professional practice are not valid.
- Drugs dispensed pursuant to invalid prescriptions are not for legitimate medical purpose, the drugs are being diverted.
- Not limited to Internet pharmacies.

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## SUMMARY

- A pattern of drugs being distributed to pharmacies who are diverting controlled substances demonstrates the lack of effective controls against diversion by the distributor
- The DEA registration of the distributor could be revoked under public interest grounds

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# SUMMARY

- Any Distributor who is selling controlled substances that are being dispensed outside the course of professional practice must stop immediately
  
- DEA cannot guarantee that past failure to maintain effective controls against diversion will not result in action against a distributor

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# SUMMARY

- DEA will:
  - Meet with other distributors
  - Provide this information to your employees at your request
  - Meet with Industry groups or associations to discuss issue as requested

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[www.deadiversion.usdoj.gov](http://www.deadiversion.usdoj.gov)

- Current Revocation Actions
- Policy Changes
- Validation of Registration
- Links to web sites with useful information (AMA, Pain Management, Pharmacy, etc.)
- Other

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**NEW DATA REVEAL 400% INCREASE IN SUBSTANCE ABUSE TREATMENT ADMISSIONS FOR PEOPLE ABUSING PRESCRIPTION DRUGS**  
*White House Bulletin*

WASHINGTON - Today, Gil Kerlikowske, Director of National Drug Control Policy (ONDCP), and Thomas McLellan, Deputy Director of ONDCP, joined Peter Delany, Director of Substance Abuse and Mental Health Services Administration's (SAMHSA) Office of Applied Studies, and Michele M. Leonhart, Acting Administrator of the Drug Enforcement Administration (DEA), to release a new study showing a 400 percent increase in substance abuse treatment admissions for prescription pain relievers. Governor Jack Markell of Delaware and Chris Kennedy Lawford were also in attendance.

The study, Substance Abuse Treatment Admissions Involving Abuse of Pain Relievers 1998-2008, conducted by the SAMHSA, and based on the agency's Treatment Episode Data Set (TEDS) reveals a 400 percent increase between 1998 and 2008 of substance abuse treatment admissions for those aged 12 and over reporting abuse of prescription pain relievers. The increase in the percentage of admissions abusing pain relievers spans every age, gender, race, ethnicity, education, employment level, and region. The study also shows a more than tripling of pain reliever abuse among patients who needed treatment for opioid dependence.

"The TEDS data released today highlights how serious a threat to public health we face from the abuse of prescription drugs," said Gil Kerlikowske, National Drug Policy Director. "The spikes in prescription drug abuse rates captured by this study are dramatic, pervasive, and deeply disturbing."

"The non-medical use of prescription pain relievers is now the second-most prevalent form of illicit drug use in the Nation, and its tragic consequences are seen in substance abuse treatment centers and hospital emergency departments throughout our Nation," said SAMHSA Administrator Pamela S. Hyde, J.D. "This public health threat demands that we follow the President's National Drug Control Strategy's call for an all-out effort to raise awareness of this risk and the critical importance of properly using, storing, and disposing of these powerful drugs."

"The data released today is alarming and shows the tremendous damage being caused by prescription drug abuse all across this country each and every day," said DEA Acting Administrator Michele M. Leonhart. "The effective enforcement of laws regulating the distribution of controlled substances, coupled with their lawful disposal are essential parts of a comprehensive strategy to reduce drug abuse. DEA is committed to being part of the solution, however it will take all of us working together to prevent the tragedies that inevitably come with drug abuse."

"This rise in prescription drug abuse is no surprise to the doctors and law enforcement professionals who see its effects in our communities," said Governor Markell. "We have been focused on making sure that health care professionals have the best tools

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available to detect and prevent this kind of abuse before it ruins lives. Delaware's new legislation to authorize a prescription monitoring program is one of those tools and an important component of the President's National Drug Control Strategy."

"Our national prescription drug abuse problem cannot be ignored. I have worked in the treatment field for the last 35 years, and recent trends regarding the extent of prescription drug abuse are startling," said A. Thomas McLellan, Deputy Director of ONDCP. "We must work with prescribers, the pharmaceutical industry, law enforcement, and families to help us fight this scourge."

The National Drug Control Strategy, released in May, outlines several steps to address what Director Kerlikowke calls "the fastest-growing drug problem in the United States"-prescription drug abuse.

They include

- \* Increasing prescription drug return, take-back, and disposal programs. Prescription drugs that are commonly abused are often found in the family medicine cabinet, and individuals should get rid of unused or expired prescription drugs to prevent diversion and abuse.
- \* Educating physicians about opiate painkiller prescribing. The Administration's FY 2011 Budget request proposes funding for a program to train prescribers on how to instruct patients in the use and proper disposal of painkillers, to observe signs of dependence, and to use prescription drug monitoring programs to detect when an individual is going from doctor to doctor in search of prescriptions (also called "doctor shopping").
- \* Expanding prescription drug monitoring programs. Currently, these programs are operating in 34 states. The Administration supports establishment of these programs in every state, and is seeking to ensure new and existing monitoring programs effectively use the data they acquire and share information across state lines.
- \* Assisting states in addressing doctor shopping and pill mills. Criminal organizations have established thriving businesses of transporting people to states with little regulation to obtain prescription drugs from multiple doctors or from pill mills, which distribute drugs indiscriminately. Federal, state, local, and tribal authorities are working together to address this problem.
- \* Driving illegal Internet pharmacies out of business.
- \* Cracking down on rogue pain clinics that do not follow appropriate prescription practices.

The National Drug Control Strategy provides a blueprint for reducing prescription drug abuse. Parents, law enforcement, the medical community, and all levels of government have a role to play in reducing prescription drug abuse.

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Later today, Director Kerlikowke will travel to Delaware to attend Governor Markell's bill signing for the Delaware Prescription Drug Monitoring Program.

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## U.S. can stop some drug sales at 2 CVS stores: judge

Tue, Nov 13, 2012

WASHINGTON (AP) — The U.S. Drug Enforcement Administration can stop two CVS Caremark Corp. pharmacies from selling potentially addictive drugs in a town including two of the nation's most active U.S. District Judge Reggie Walton vacated a temporary restraining order that had blocked the Drug Enforcement Administration (DEA) from acting against the two Florida stores suspected of selling stocks of the addictive opiate painkiller oxycodone.

Walton stayed his ruling until 4 p.m. (EST) GMT on Wednesday to give CVS Caremark attorneys time to appeal. But the company appealed later on Tuesday. Further delays were not considered likely. CVS Caremark had asked the judge to require a preliminary injunction that could have blocked the DEA from taking further legal action. The judge declined that request late this year.

Walton said he could find no reason to believe the CVS argument that DEA had acted in an "arbitrary and capricious" manner in ordering sales suspended or that essential steps taken by CVS were sufficient. The argument seems to be based on the DEA's same argument that the DEA had acted in an "arbitrary and capricious" manner in ordering sales suspended or that essential steps taken by CVS were sufficient.

The DEA said to court documents that about 2 million Americans abuse pharmaceuticals made with controlled substances for purposes not related to medicine and that Florida is the center of the growing epidemic.

The federal agency cited state statistics showing a 34% percent increase in overdose deaths related to oxycodone from 2006 to 2010, and an average 11 deaths per day from oxycodone, methadone, hydrocodone, benzodiazepines or propofol.

In a case related to the CVS ruling, Walton last month allowed the DEA to suspend Cardinal Health Inc. sales to distribute controlled substances from a Florida facility that serves about 2,000 drug stores or hospitals.

The ruling was later blocked temporarily by a U.S. appeals court. Walton said he expected the appeals court to take the same action on CVS.

The CVS stores are two of four Cardinal customers that DEA has said were disproportionately filling oxycodone prescriptions.

A CVS attorney said the company had supplied oxycodone sales at the two pharmacies. But a U.S. District Court judge said the company had supplied other controlled substances.

The DEA charged that between January 2008 and December 2011 the two CVS stores purchased thousands of oxycodone for its network of retail pharmacy stores, against DEA warnings and exceeded the limit only after the DEA acted.

A CVS attorney told the court that the pharmacies were not out of line for purchasing pharmaceuticals that represent 24-hour service and expect that same-day sales taken by CVS had involved any immediate danger to the community by the time the DEA ordered sales suspended in February.

The stores are Waldbaum CVS LLC, Justice Department, No. 12-00197.

Reporting by David Mitchell; Editing by Gary Holt

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## DEA: Oxycodone orders by pharmacies 20 times average USA Today.com

Two Florida CVS pharmacies ordered more than 3 million oxycodone pills in 2011, more than 20 times higher than the national average, DEA agents said Monday.

As part of a crackdown on rampant painkiller abuse in Florida, the Drug Enforcement Administration charged a major health care company and the two CVS pharmacies in Sanford, Fla., with violating their licenses to sell the powerful pain pills and other drugs.

"It's a tremendous amount, way beyond what would be by legitimate use," said Mark Trowell, DEA special agent in charge of the Miami Field Division. "We're not talking about a gray area here."

The average pharmacy in the United States ordered about 60,000 oxycodone pills in 2011, the DEA said. The two CVS pharmacies, located less than 4 miles apart, ordered 3 million.

It is the first time the DEA has suspended the license of a chain pharmacy in Florida to its alleged role in the state's prescription drug abuse problem, Trowell said. The DEA had previously targeted pain clinics known as "pill mills" where rogue doctors prescribe thousands of pain pills with only cursory examinations.

"This is absolutely not the end of the investigation," Trowell said. "We know when we hit the pill mills that pharmacies would be the next issue. We just didn't know chain pharmacies would get into it."

CVS said it took steps with DEA's knowledge to stop filling prescriptions from doctors thought to be prescribing improperly.

"We ordered a small number of Florida physicians that CVS pharmacy will no longer fill the prescriptions they write for Oxycodone or Norco," spokeswoman Carolyn Cahill said in a written statement. "Distributions of oxycodone to the two Florida stores have decreased by approximately 10% in the last 12 months compared to the same three months — we believe in large part due to our action."

On Friday, the DEA also suspended Cardinal Health's controlled substances license at its Lakeland, Fla., distribution center after linking it to high-volume orders of pain pills to four Florida pharmacies, including the two in Sanford. The distribution center services 2,500 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily halted the suspension after Cardinal said it would stop supplying the drugs to the four pharmacies. A hearing on the suspension order was set for Feb. 10 in Washington, D.C.

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Cardinal CEO George Barrett called the DEA action a "hasty overreaction" and said the company has "extensive processes" to prevent diversion of its pharmaceuticals for illegitimate use. Cardinal's internal controls have flagged more than 100 pharmacies in Florida and 300 pharmacies nationwide for "suspicious order patterns," he said.

"The needs of pharmacies are varied, and higher volumes can be appropriately based on a number of factors, including pharmacy size, hours of operation, patient demographics and proximity to hospital and surgery centers, nursing homes, cancer clinics, and hospice providers," Cardinal said in a statement.

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**DEA moves against two Florida pharmacies, distributor over pill sales**  
**CNN.com**

(CNN) -- Agents from the Drug Enforcement Administration raided two CVS pharmacies in central Florida over the weekend, removing controlled substances and suspending the stores' ability to handle or distribute drugs such as painkillers oxycodone and hydrocodone.

The DEA said that during one year, the two pharmacies -- both in Sanford, Florida -- ordered more than 3 million oxycodone units from a pharmaceutical wholesaler, which is a typical pharmacy order 65 000.

"Each registrant (pharmacy) was filing prescriptions far in excess of legitimate needs of its customers," said DEA Special Agent in Charge Mark Trouville during a press conference Monday in central Florida.

The DEA also has suspended the controlled substance license of the wholesale distributor, Cardinal Health of Lakeland, Florida, according to Trouville.

"Cardinal Health did not fulfill its due diligence to ensure controlled substances were not diverted into other than legitimate channels," Trouville said.

On Friday, Cardinal Health filed and received an emergency injunction from a federal judge in Washington allowing the drug supplier to continue filling orders for other pharmacies.

"We believe the DEA is wrong," said Cardinal Health Chairman and CEO George Barrett in a written statement.

"We strongly disagree with the allegations the DEA has made against our facility and intend to vigorously challenge this action," said Barrett.

The two Sanford pharmacies remain open filing regular prescriptions but they cannot fill prescriptions for controlled substances such as oxycodone, one form of which is the well-known narcotic OxyContin.

CVS said in a written statement that the company is disappointed by the DEA actions but is fully cooperating with the DEA suspension. "CVS/pharmacy is unwavering in its commitment with and support of the measures taken by federal and state law enforcement officials to prevent drug abuse and keep controlled substances out of the wrong hands," said CVS spokesman Mike DeAngelo.

Hearings on the suspensions will be held but no date has been set.

Trouville said that since the state of Florida moved to crack down on "pill mills" by banning doctors from directly distributing controlled narcotics, pharmacy sales of controlled substances have skyrocketed.

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# DEA agents raid CVS pharmacies

By ANNE K. HERRINGER Staff Writer

Federal drug authorities raided two CVS stores in Tennessee County on Monday, seizing boxes of medications and other materials from the pharmacies.

CVS spokesman Michael DeArango said the raid was related to an action by the Drug Enforcement Agency against Cardinal Health, which has a large distribution center in Louisville.

The DEA tried to acquire the license of Cardinal Health in order to keep the company from shipping drugs such as controlled substances from the Louisville center. The company has had DEA licenses in a billion-dollar pharmaceutical company, a billion-dollar pharmaceutical company, and a billion-dollar pharmaceutical company.

The raid occurred at two CVS pharmacies in the Nashville, Tennessee, area. The DEA agents seized boxes of medications and other materials from the pharmacies.

Agents on Saturday had raided the CVS pharmacy at 2000 Church Street in Nashville, and then returned to the Nashville CVS pharmacy at 2000 Church St. in Nashville.

About a dozen DEA agents searched the stores at each location, packaging items into boxes and the pharmacy's computers while CVS employees stood silent in the background.

One was disappointed that the DEA had taken a different route on this raid from all previous controlled substance raids. The agents had to be escorted to the stores.

The raid occurred several days after the DEA agents had raided the Nashville CVS pharmacy at 2000 Church St. in Nashville.

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Cardinal Health said it has cooperated with the agency and has stopped shipping to areas that lack Florida pharmacies in the past few years.

"We believe the DEA is overreacting," Cardinal Health said in a statement. "We are committed to the law and will continue to work with the DEA to resolve any issues."

CVS also defended its record, claiming its distribution of controlled substances has been an "open market" in order to prevent drug shortages and help underserved areas of the country.



CVS special agent David Mettenbergt, left, and a DEA agent inspect boxes of medications seized from a Nashville CVS store Saturday.

They were not looking for a small group of pills, but for large quantities of pills, which they found in the pharmacies. They were looking for pills that were not in the pharmacies.

"While we do get very, very occasionally, this may cause for our customers, we treat the dispensing of controlled substances with the utmost care and attention," CVS said in an email received by USA Today.

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# DEA charges 2 Fla. pharmacies in pill mill probe

Drug wholesaler also under investigation

By Dawn Loveland Staff Writer

Federal authorities have expanded their crackdown on pill mills, charging a major wholesaler and two CVS pharmacies in Florida with helping their licensed to sell powerful pain pills and other drugs.

The Drug Enforcement Administration issued a subpoena to Cardinal Health, a major wholesaler of controlled drugs to four pharmacies.

On Friday, the DEA subpoenaed Cardinal's controlled substance wholesaler at its Louisville, Ky., distribution center, which services 1,000 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily banned the supplier from the state after Cardinal, a \$1.3 billion company, said it would stop shipping the drugs to the four pharmacies. A hearing on the injunction order was set for Feb. 13 in Washington, D.C.

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the company responsible for a part of the supply chain it does not control.

"At the time we filed these orders, the pharmacies had valid state licenses of pharmacy and DEA licenses," Burtin said in a call to USA Today Friday.

"Pharmacies should be able to get their hands on the manufacturer of controlled substances. We do not see the problem," he said.

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**Cardinal Health settles drug distribution case**  
*USA Today*  
May 16, 2012

The DEA suspended Cardinal Health, the country's second largest drug distributor, from selling and shipping powerful painkillers and other drugs from its Lakeland, Fla., facility for two years as part of a settlement reached Tuesday.

The Drug Enforcement Administration sought to revoke Cardinal's license in February, accusing the company of selling excessive amounts — more than 1.2 million oxycodone pain pills — to four Florida pharmacies over three years. The DEA said the company did not report suspicious orders or visit the chain pharmacies that purchased large amounts of the drugs.

The DEA also suspended controlled substances licenses for two CVS pharmacies in Sanford, Fla., which purchased millions of oxycodone pills from Cardinal. A judge is expected to rule on the CVS case this month.

"Cardinal Health is not above the law," said Joe Ruzonickis, DEA deputy assistant administrator. "With this agreement, it admits that it neglected its vital responsibility to prevent the diversion of controlled substance medications."

While the agreement resolves the licensing issue, the DEA said it may pursue civil penalties, including fines, against the company. The Dublin, Ohio-based company had revenue of more than \$100 billion in 2011.

This is the second time the DEA has taken action against Cardinal. In 2006, Cardinal paid a \$34 million fine after the DEA accused it of shipping excessive amounts of hydrocodone, another powerful painkiller, to Internet pharmacies. As part of that settlement, the DEA suspended licenses at three distribution facilities for a year.

Cardinal admitted Tuesday it had "inadequate" control over some of its controlled drugs and had not fully complied with the 2006 agreement.

"This agreement allows us to put this matter behind us, and just as important, will clear the way for a more productive dialogue about how we and others in the health care and regulatory community can work together to prevent the abuse and misuse of prescription drugs," Cardinal CEO George Barrett said.

The five-year agreement applies to all 28 of Cardinal's distribution facilities and requires the company to review orders for the controlled drugs, visit pharmacies to look for signs of diversion and hire extra field inspectors for Florida pharmacies.

The Lakeland facility can still distribute non-controlled drugs and medical supplies.

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**Cardinal Plant Can't Stop Pain Pills**

*Wall Street Journal*

A U.S. appeals court ruled Friday that a Cardinal Health Inc. distribution hub in Florida can't ship prescription painkillers while the company battles a Drug Enforcement Administration move to suspend that facility's license.

While the appeals court recently issued a stay of the DEA's enforcement efforts against Cardinal's Lakeland, Fla., facility, the court Friday said Cardinal hasn't met the stringent requirements for an injunction. The decision means the Lakeland facility can't ship controlled substances until the appeal is resolved.

Cardinal, based in Dublin, Ohio, said it activated contingency plans earlier this month "and will continue to endeavor to meet our customers' needs with minimal disruption from our other distribution centers."

The contingency plans involve shipping controlled drugs to customers in the Southeast U.S. from alternative facilities in Mississippi or North Carolina. Analysts have said the plan could add transportation costs to Cardinal and delay deliveries.

The suspension of the DEA license means the Lakeland facility is barred from shipping controlled medications like the pain drug oxycodone to thousands of pharmacies, hospitals and other health care providers. Cardinal, the nation's No. 2 drug distributor by sales after McKesson Corp., also still ships noncontrolled medications, which include most prescription drugs, and supplies such as surgical packs.

The DEA also suspended last month the controlled-substance licenses of four Florida pharmacies, including two owned and operated by CVS Pharmacy Corp. CVS sold a temporary, administrative stay on Wednesday to keep dispensing controlled medications after an appeal's court threw the pharmacy chain's request for a preliminary injunction.

The DEA took action against the Lakeland facility last month while accusing Cardinal of not doing enough to stop oxycodone abuse. Cardinal has said that it supports the DEA's efforts but also disagreed that it wasn't doing enough.

A U.S. District Court judge ruled in late February that the government acted properly in trying to cut off shipments of oxycodone from the Lakeland site. Cardinal appealed that ruling in the U.S. Court of Appeals for the District of Columbia Circuit.

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**DEA searches Fla. Walgreens in painkiller probe**

CURT ANDERSON, AP Legal Affairs Writer  
Updated 3:01 p.m., Friday, April 6, 2012

MIAMI (AP) — Federal drug agents have searched six Walgreens pharmacies and a company distribution center in Florida as part of an investigation into prescription painkiller drug abuse, U.S. Drug Enforcement Administration officials said Friday.

The distribution center in Jupiter and the six pharmacies — two in Fort Pierce and one each in Hudson, Fort Richey, Fort Myers and Oviedo — all showed signs of suspiciously high distribution of the highly addictive drug oxycodone, a DEA investigator wrote in an affidavit for the search warrants.

Such large amounts, investigator Marjorie Milan wrote, indicates "a pharmacy that fills prescriptions issued by physicians at pain clinics and/or a pharmacy which services primarily drug-seeking individuals who abuse the medication."

The searches for pharmacy records conducted Wednesday are the latest in a crackdown by federal and state authorities on "pill mills" and other illegal sources of prescription drugs in Florida, which has become the nation's leading source of oxycodone and similar drugs. The DEA says that prescription drug abuse now exceeds abuse of all illegal drugs combined, except marijuana.

Michael Polzin, a spokesman for Deerfield, Ill.-based Walgreens, said it is cooperating in the investigation.

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Earlier this year, the DEA moved to suspend the sale of similar controlled substances at two CVS pharmacies in the Orlando area, and the shipment of them from Cardinal Health Inc.'s Lakeland, Fla.-based center that supplied the stores. A federal appeals court recently upheld those suspensions.

DEA records cited in the Walgreens affidavit show sharp increases in oxycodone purchases at each of the locations. For example, the pharmacy in Fort Myers went from selling 95,860 units of oxycodone in 2009 to more than 2.1 million units in 2011 — good for 67 percent of all the oxycodone purchased by pharmacies in that same zip code in 2011.

In the first two months of this year, the DEA added, 53 Walgreens pharmacies are listed in the agency's top 100 purchasers of oxycodone. In 2009, none were on the list.

Earlier this year, the DEA released figures showing that Florida may be losing its distinction as the nation's leading illicit source for painkillers because of the ongoing law enforcement crackdown and several new laws. Florida also last year began operating a prescription drug tracking system and database aimed at combating illegal diversion of the drugs.

About 83 people, including at least 13 doctors, have been arrested in South Florida over the past year on pill mill-related charges, according to federal prosecutors.

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The DEA's prescription drug policy saves many lives.  
 Wall Street Journal  
 By: Peter Hensinger and Robert L. DuPont

Scott Gottlieb's "The DEA's War on Prescription—and Pain Patients" (op. ed., March 23) hardly tells the true story of prescription drug abuse and the government's response. In the current Cardinal Health case, the Drug Enforcement Administration discovered numerous oxycodone transactions that greatly exceeded the "suspicious order" criteria in the law and were not halted or reported to the DEA. Cardinal Health was fined \$34 million in 2008 for similar violations.

Last July, the Florida legislature declared a public-health emergency—not because of a shortage of medicine, but because of increased overdose deaths caused by prescription opioids. Last year 25 distributors provided over 570 million dosage units of oxycodone in Florida alone, with Cardinal Health accounting for 25%.

Dr. Gottlieb thinks transferring DEA's responsibilities to the FDA would be a good idea, yet the FDA's record when it comes to regulating controlled substances is not good. In 1996, FDA asked FDA to schedule Somax (carisoprodol), a muscle relaxant abused by opiate addicts. In 2009, 13 years later, the FDA granted permission to schedule the drug. In 2004, the DEA asked the FDA to reschedule hydrocodone products (Vicodin, Lortab, etc.). The FDA responded four years later but did not agree to tighten the controls on what continues to be America's most frequently prescribed opioid associated with significant overdose deaths. A bill currently in Congress, if passed, will accomplish this long overdue action.

Prescription-drug overdose deaths now exceed U.S. motor-vehicle fatalities. The only federal agency that has confronted the unlawful diversion of these drugs is the DEA. Shifting regulatory control from the DEA to the FDA would accomplish nothing, but would add to the problem.

The DEA represents the unspoken interests of tens of thousands of victims harmed or killed each year by prescription drug abuse. The DEA's enforcement actions in Florida are clearly in the public interest, and its regulatory authority should not be diminished, but strongly supported.

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Top 80 Pharmacies Sales of Oxycodone 16mg (NDC 62162-0214-02) 2010							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000528	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	246,000
2	AB9244487	BERNIE'S PHARMACY	SUSSEX	ANCHORAGE	AK	99508	233,600
3	FH8852267	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	194,800
4	BH8636688	HEPZIBAH	HILLSBOROUGH	TAMPA	FL	33613	177,300
5	BE812764	EXPRESS SCRIPTS	BUCKS	BENSALEM	PA	19020	168,300
6	BT7485168	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIOCH	TN	37013	160,000
7	BJ3876466	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	149,000
8	FJ9306889	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	146,900
9	BS1242449	SAFESCRIP PHARMACY #6	CABELL	HUNTINGTON	WV	25701	145,400
10	AW0202804	WALGREEN CO.	BREVARD	PALM BAY	FL	32906	139,000
11	FH1161617	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	136,100
12	BW8872894	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	127,900
13	FS0617893	SANDLAKE PHARMACY	ORANGE	ORLANDO	FL	32819	126,600
14	BE1131626	ESI MAIL PHARMACY SERVICE	MARICOPA	TEMPE	AZ	85284	126,600
15	BW1648780	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	125,300
16	AW1366737	WALGREEN CO.	LEE	FORT MYERS	FL	33907	124,100
17	BP4777682	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	117,400
18	BN2447226	NORWIN PHARMACY	WESTMORELAND	IRWIN	PA	15642	110,200
19	BO8931687	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	108,700
20	BH8875626	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	103,400
21	AW4309843	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	101,100
22	BW0153816	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	98,600
23	BW6038904	WALGREEN EASTERN CO., INC.	STRAFFORD	ROCHESTER	NH	03687	98,000
24	FW0277383	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	98,000
25	FP1067164	PERRY DRUG INC.	JOHNSON	LENEXA	KS	66216	97,600
26	BW8910779	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819	96,800
27	FU1700612	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29606	94,700
28	BW8837891	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	63222	93,600
29	BH8874610	HAPPY HARRY'S INC.	SUSSEX	LEWES	DE	19958	93,600
30	BW7920413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234	91,600
31	AW8020841	WALGREEN CO.	MANATEE	BRADENTON	FL	34206	90,600
32	AE8893374	ELK PHARMACY INC	SURRY	ELKIN	NC	28621	89,300
33	BL4228116	LOVELACE OUTPATIENT PHARMACY	BERNILLILLO	ALBUQUERQUE	NM	87108	89,800
34	BH8874161	HAPPY HARRY'S INC.	NEW CASTLE	NEWARK	DE	19713	88,700
35	AM8423880	MANOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	87,800
36	AW6020839	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	86,300
37	BH8876216	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19956	86,000
38	BE8244117	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	85,700
39	BW4713892	WALGREEN CO.	PASCO	HUDSON	FL	34687	84,300
40	BP2462326	PHARMCORE INC	BROWARD	HALLANDALE	FL	33009	82,600
41	A97118246	TRU-VALU DRUGS	PALM BEACH	LAKE WORTH	FL	33460	82,600
42	FW0988447	WALGREEN CO.	ORANGE	WINTER PARK	FL	32789	82,200
43	BW8661870	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34982	82,000
44	BW8403913	WALGREEN CO.	ASHTABULA	ASHTABULA	OH	44004	81,700
45	AG4388238	P & S PHARMACY	SULLIVAN	KINGSFORD	TN	37660	81,600
46	FW1422812	WALGREEN CO.	MATANUSKA-SUSITNA	WASILLA	AK	99684	81,400
47	BH8874923	HAPPY HARRY'S INC.	SUSSEX	MILLSBORO	DE	19966	81,200
48	BW8187881	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	80,400
49	BW7169184	WALGREEN CO.	SALT LAKE	SALT LAKE CITY	UT	84118	79,400

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 52182-0216-02) 2010							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF700626	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37819	1,360,800
2	BJ367646	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	1,079,100
3	BG6977630	GENERIC-DEPOT #2 INC	BROWARD	HOLLYWOOD	FL	33026	970,400
4	FG144229	GENERIC DEPOT 3, INC	BROWARD	FORT LAUDERDALE	FL	33321	782,400
5	FH772247	HILLS PHARMACY	HILLSBOROUGH	TAMPA	FL	33616	663,400
6	B3076216	JR PHARMACY	ORANGE	ORLANDO	FL	32837	618,600
7	AW9830267	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	609,700
8	BW1648780	WALGREEN CO.	SEMNOLE	CASSELBERRY	FL	32730	543,600
9	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	642,300
10	BW6072404	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	617,700
11	BS0931617	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	492,000
12	BW3133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	470,600
13	AW9808658	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	447,200
14	IBK7456042	KABS OF TAMPA	HILLSBOROUGH	TAMPA	FL	33613	486,400
15	BS9256274	SUPERIOR PHARMACY LLC	HILLSBOROUGH	TAMPA	FL	33609	379,300
16	BB6331169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	362,900
17	FN1282948	NDBP LLC	BROWARD	POMPANO BEACH	FL	33064	369,200
18	AW2089987	WALGREEN CO.	PINELLAS	LARGO	FL	33771	362,700
19	FK1428146	KISKEYA PHARMACY	BROWARD	FORT LAUDERDALE	FL	33312	349,200
20	BH9131436	HYGEIA HOLDINGS, LLC	PINELLAS	LARGO	FL	33771	336,700
21	BW7066647	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428	332,800
22	BP4777612	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	323,800
23	AW6430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	319,200
24	BS9499711	SUPERIOR PHARMACY, LLC	HILLSBOROUGH	TAMPA	FL	33616	318,100
25	BR9372710	RUPAL ENTERPRISE INC	SUFFOLK	SELDEN	NY	11784	316,600
26	F1672745	JPPD INC	PALM BEACH	BOCA RATON	FL	33431	314,300
27	AS6441418	SCHAEFER DRUGS WELLINGTON	PALM BEACH	WELLINGTON	FL	33414	313,900
28	FF0129708	FUTURE PHARMACY LLC	MIDDLESEX	OLD BRIDGE	NJ	08857	313,600
29	BL1611718	L KRENK	MAUI	KAHLUI	HI	96732	312,600
30	BB944847	BETTER HEALTH PHARMACY INC	HILLSBOROUGH	SEFFNER	FL	33594	310,200
31	BS4911447	SUPER SAVER PHARMACY	OSCEOLA	KISSIMEE	FL	34744	300,400
32	BW0829687	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	298,900
33	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33807	296,100
34	AW0200959	WALGREEN CO.	BROWARD	HOLLYWOOD	FL	33024	294,100
35	BW6661270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	291,000
36	FP1223889	PROGRESSIVE PHARMACY INC.	PALM BEACH	LAKE WORTH	FL	33467	287,400
37	AH2731026	HOLLYWOOD DISCOUNT PHARMACY	BROWARD	HOLLYWOOD	FL	33021	286,300
38	BW7288782	WALGREEN CO.	ORANGE	OCEEH	FL	34761	282,400
39	AW028394	WALGREEN CO.	BREVARD	PALM BAY	FL	32969	277,700
40	BS838424	SARASOTA PHARMACY SERVICES	SARASOTA	SARASOTA	FL	34233	277,300
41	FE1612601	EDGE PHARMACY	POLK	LAKELAND	FL	33803	272,900
42	AW646888	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	269,600

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 52182-0214-02) 2011							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	AW1368877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	411,100
2	FH983247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	146,000
3	BE892417	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	131,800
4	BH944619	WALGREEN CO.	SEMNOLE	HUDSON	FL	32768	128,300
5	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	122,800
6	BT0167444	THE MEDICINE SHOPPE	ALLEGHENY	OAKMONT	PA	15139	122,000
7	FW0277283	WALGREEN CO.	CALVERT	PRINCE FEDERICK	MD	20678	121,400
8	BT9937966	THE PILL BOX PHARMACY	SUSSEX	MILFORD	DE	19963	110,600
9	BW6872494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	109,800
10	BC7126467	CAREMED HEALTH CORPORATION	LEE	BONITA SPRINGS	FL	34135	109,300
11	FH1616167	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	106,300
12	BN9244726	NORWIN PHARMACY	WESTMORELAND	IRWIN	PA	15642	106,200
13	FP1864446	PHARMA-1	FRANKLIN	COLUMBUS	OH	43207	106,600
14	AB9244697	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	106,600
15	FV2178879	VILLAGE PHARMACY	LIVINGSTON	DENHAM SPRINGS	LA	70726	101,200
16	BW1648780	WALGREEN CO.	SEMNOLE	CASSELBERRY	FL	32730	99,000
17	AW3023004	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	98,900
18	BE7308206	ESTRELLA PHARMACY	MARICOPA	PHOENIX	AZ	85037	96,400
19	AT1701972	CITY PHARMACY INC OF ELKTON	CECIL	ELKTON	MD	21821	94,900
20	BW6641270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	93,200
21	AW9830247	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	92,900
22	AN1666337	NATIONAL FAMLY PHARMACY	SEBASTIAN	FORT SMTH	AR	72801	86,700
23	FW1144674	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	86,300
24	BW6607416	WALGREEN CO.	SEMNOLE	OVIDEO	FL	32766	83,900
25	FU1700612	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29606	83,800
26	FW1446998	WALGREEN CO.	ORANGE	ORLANDO	FL	32807	81,800
27	BS9246349	SAFESCRIPT PHARMACY #6	CABELL	HUNTINGTON	WV	25701	81,900
28	BW3818781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	79,900
29	BF7000826	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37819	79,200
30	BH9876926	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	79,100
31	BW6637691	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	78,300
32	FJ1308489	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	77,800
33	FH938816	HAPPY HARRY'S INC.	KENT	DOVER	DE	19904	77,500
34	FW1223869	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	76,500
35	AW9020659	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	76,500
36	FF1280989	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37832	74,400
37	BH9876926	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19956	74,300
38	FW0889272	WALGREEN CO.	CLARK	WINCHESTER	KY	40391	74,200
39	BW2101890	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	73,900
40	BW1768789	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709	73,900
41	AW6043234	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712	69,800
42	FW1422612	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99664	68,500
43	BW3133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	68,500
44	AM6423080	MANOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	66,200
45	BW6997806	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	66,000
46	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947	64,700
47	AW1768463	WALGREEN CO.	MARTIN	STUART	FL	34997	64,700

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC00228-2879-1) 2011							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000226	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	851,200
2	BW8487438	WALGREEN CO.	SEMINOLE	OVIDEO	FL	32765	817,400
3	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	718,800
4	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	618,500
5	BW5872494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	439,900
6	BW6561270	WALGREEN CO.	SAINT LUCIE	FORT SAINT LUCIE	FL	34952	429,500
7	FR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	BOGALUSA	LA	70427	418,200
8	BW1249160	WALGREEN CO.	SAINT LUCIE	FORT SAINT LUCIE	FL	34952	404,800
9	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	356,800
10	AN1556337	RATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72901	334,700
11	BW1548760	WALGREEN CO.	SEMINOLE	CABELBERRY	FL	32730	308,400
12	AW1307138	WALGREEN CO.	CITRUS	HOMOBASSA	FL	34446	295,300
13	BW9688992	WALGREEN CO.	MARION	OCALA	FL	34482	295,000
14	BW9628631	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33702	291,200
15	FDQ998207	DUANE READE	NEW YORK	NEW YORK	NY	10003	289,800
16	BW1229118	WALGREEN CO.	DUVAL	JACKSONVILLE	FL	32216	285,300
17	BF6499508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919	259,300
18	FW0437122	WALGREEN CO.	CITRUS	HOMOBASSA	FL	34446	247,100
19	AW1768463	WALGREEN CO.	MARTIN	STUART	FL	34997	244,900
20	BW8940923	WALGREEN CO.	PINELLAS	LARGO	FL	33771	228,400
21	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	223,500
22	BW0882957	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	217,400
23	AK3221140	KEANSBURG DRUGS	MORMOUTH	KEANSBURG	NJ	07734	214,700
24	BB6383169	BLEW DRUG	KNOX	KNOXVILLE	TN	37917	210,200
25	AW0201032	WALGREEN CO.	PALM BEACH	WEST PALM BEACH	FL	33404	209,800
26	BW7066547	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428	208,000
27	AW3282421	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34950	206,400
28	FW0064799	WALGREEN CO.	PALM BEACH	WELLINGTON	FL	33414	205,600
29	PH0826319	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	OH	45069	204,600
30	AW2290699	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	202,700
31	B36784654	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	201,900
32	FW1444698	WALGREEN CO.	ORANGE	ORLANDO	FL	32807	197,600
33	AW6042324	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712	196,500
34	BW4808929	WALGREEN CO.	INDIAN RIVER	VERO BEACH	FL	32962	196,500
35	BW5507410	WALGREEN CO.	SEMINOLE	OVIDEO	FL	32765	191,900
36	BW5108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816	191,700
37	BH4283309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614	190,700
38	BE9503687	E. HARTMAN LLC DBA DEAL DRUGS	DAVIDSON	NASHVILLE	TN	37211	188,800
39	BW0806468	WINBOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	185,000
40	AW6041183	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33703	180,700
41	BW7758759	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709	178,800
42	PH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	178,600
43	BW0523488	WALGREEN CO.	PASCO	NEW PORT RICHEY	FL	34653	177,400
44	BW4933114	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33707	177,400
45	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	174,400
46	BA3438505	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128	173,900

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 00228-2878-1) January 1, 2012 to June 30, 2012							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BW9837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	132,200
2	AB9244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	127,600
3	FB2049446	BYPASS PHARMACY, INC	RALEIGH	BECKLEY	WV	25801	105,800
4	FH1151517	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	104,000
5	BZ7006384	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	88,000
6	BD1674444	THE MEDICINE SHOPPE	ALLEGHENY	DAKNOTT	PA	15139	84,000
7	FH1454999	HOWARD FAMILY PHARMACY, INC.	FLOYD	EASTERN	KY	41622	82,600
8	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	81,800
9	BF4788603	FRANCK'S EPS	ALLEGHENY	PITTSBURGH	PA	15202	81,600
10	FA2348616	ARIZONA PHARMACY # 2	MARICOPA	PHOENIX	AZ	85027	79,600
11	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	76,400
12	BW5093858	WALGREEN EASTERN CO., INC.	PROVIDENCE	WOONSOCKET	RI	02895	75,800
13	BC8361343	CRAIN TOWERS PHARMACY	ANNE ARUNDEL	GLEN BURNIE	MD	21061	75,800
14	BW4050996	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208	75,600
15	FW1144874	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	74,000
16	BW7920413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234	73,400
17	FU1700512	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29608	72,800
18	PH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	72,000
19	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	70,200
20	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	70,200
21	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	69,600
22	BN7188386	NORTHSIDE PHARMACY LLC	LAFAYETTE	LAFAYETTE	LA	70501	69,600
23	FW1422812	WALGREEN CO.	MATANUSKA SUBSITNA	WASILLA	AK	99654	67,000
24	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947	65,200
25	BW819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	64,400
26	BW8910879	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819	64,000
27	BT7485166	THE WELLNESS PHARMACY INC.	DAVIDSON	ANTIOCH	TN	37013	63,400
28	FJ1305689	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	63,000
29	BW6678734	WALGREEN CO.	BALTIMORE CITY	BALTIMORE	MD	21224	63,000
30	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	63,000
31	FM1704825	MEDARBOR PHARMACY	MONTGOMERY	BALA CYNWYD	PA	19004	62,400
32	BW7143908	WALGREEN CO.	HILLSBOROUGH	TAMPA	FL	33603	61,800
33	BK9525560	EXPRESS CARE PHARMACY	MARICOPA	AVONDALE	AZ	85392	58,600
34	EL2404115	LAKE PHARMACY	LAKE	CLEARLAKE	CA	95422	58,200
35	BW9404358	WALGREEN EASTERN CO., INC.	BUCKS	LEVITTOWN	PA	19054	58,000
36	BW3097393	WALGREEN HASTINGS CO.	BANDOLVA	RIO RANCHO	NM	87124	58,000
37	FR2333780	RT 70 PHARMACY, INC	CAMDEN	CHERRY HILL	NJ	08034	56,400
38	BW6057790	WALGREEN CO.	PUEBLO	PUEBLO	CO	81005	56,200
39	BW5119498	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208	56,000

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 52152-0214-02)				
January 1, 2012 to June 30, 2012				
Rank	Buyer's DEA Number	Buyer's Name	Buyer's State	Total
1	FQ1872844	QUICK CARE PHARMACY INC	CA	3,600
2	AA8612790	CIGNA HEALTH PLAN OF ARIZONA	AZ	2,400
3	BF3545704	FRUTH PHARMACY #16	OH	2,400
4	FD0982846	DELCO DRUGS & SPECIALTY PHARMACY INC.	NY	1,000
5	BB9732389	BASHAS UNITED DRUG #160	AZ	1,000
6	BF1124609	FRUTH PHARMACY OF HURRICANE	WV	900
7	FM0386082	MORRILTON FOOD & DRUG BIG STAR	AR	600
8	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	TX	500
9	AK5643095	KLINGENSMITH'S DRUG STORE	PA	500
10	BR3876084	REEDSBURG MEDIC ARTS PHAR	WI	300
11	AW4125452	BUFFALO DRUGS INC	MI	200
12	BE8487589	EDMONDSON DRUG CO INC	AL	100
13	FT0710649	TAINO STAR PHARMACY INC	NY	100

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Top 50 Pharmacies							
Sales of Oxycodone 30mg (NDC 52152-0215-02)							
January 1, 2012 to June 30, 2012							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	B09283184	OLD TOWN PHARMACY INC	RICHMOND	STATEN ISLAND	NY	10305	26,000
2	BM4633269	MW & W GLOBAL ENTERPRISES INC	KINGS	BROOKLYN	NY	11223	17,600
3	BB4866784	BARRINGTON-WILSHIRE PHARMACY	LOS ANGELES	LOS ANGELES	CA	90023	12,000
4	FB2338918	SAY MART PHARMACY II	WAYNE	DETROIT	MI	48207	9,700
5	AR5920079	ROSSMORE PHARMACY INC	ESSEX	BELLEVILLE	NJ	07109	8,300
6	BB9114000	SANT MARY AND JESSIE, LLC	MIDDLESEX	PERTH AMBOY	NJ	08861	7,900
7	AP6437199	PARAMOUNT DRUG	BURLINGTON	RIVERSIDE	NJ	08075	7,200
8	BM9698881	MEDMART PHARMACY	FAYETTE	CONNELLSVILLE	PA	15428	7,200
9	B04868715	BRIDOE & PRATT FAMILY PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19124	6,100
10	AM9597800	MOUNDSVILLE PHARMACY	MARSHALL	MOUNDSVILLE	WV	26041	5,600
11	FB1638266	SCRIPT LIFE PHARMACY	FRESNO	CLOVIS	CA	93612	5,400
12	BD0100317	DEAL ENTERPRISE	VENTURA	SEMI VALLEY	CA	93065	4,800
13	BM0180086	MEDICINE SHOPPE	FRESNO	FRESNO	CA	93727	4,500
14	BR6653712	RIVERSIDE PHARMACY	ETOWAH	GADSDEN	AL	35901	4,100
15	BB9442966	BUPER RX PHARMACY #151	SAN DIEGO	OCEANSIDE	CA	92054	3,600
16	FT1382542	FAMILY PHARMACY	NYE	FAHRUMP	NV	89048	3,000
17	BF4837071	FOLLANSBEE PHARMACY	BROOKE	FOLLANSBEE	WV	26037	3,000
18	BQ0878629	QUICK CHEK PHCY DEPT	OCEAN	BEACHWOOD	NJ	08722	3,000
19	BB9128516	BULLIVAN PHARMACY INC	SULLIVAN	LIBERTY	NY	12754	2,400
20	FB1614519	HARPER WOODS PHARMACY LLC	WAYNE	HARPER WOODS	MI	48225	2,400
21	BF3545704	FRUTH PHARMACY #16	PIKE	WAVERLY	OH	45690	2,400
22	FQ1872844	QUICK CARE PHARMACY INC	SAN BERNARDINO	RANCHO CUCAMONGA	CA	91730	2,400
23	AF1653117	F & G PHARMACY INC	NASSAU	FARMINGDALE	NY	11735	2,000
24	FM2413780	MART PHARMACY & SURGICAL	BURLINGTON	BORDENTOWN	NJ	08605	2,000
25	AQ2494397	QUICK CHEK PHCY DEPT	HUDSON	BAYONNE	NJ	07002	2,000
26	BM1457643	MISSION PHARMACY	LOS ANGELES	LONG BEACH	CA	90813	2,000
27	AM2905935	M B DRUGS INC	KINGS	BROOKLYN	NY	11215	1,800
28	BF7447774	FARMACIA SAN ANTONIO	CAMDEN	CAMDEN	NJ	08105	1,800
29	FC0792704	CHURCH SQUARE PHARMACY	CUYAHOGA	CLEVELAND	OH	44103	1,700
30	BB9732389	BASHAS UNITED DRUG #160	PIMA	TUCSON	AZ	85704	1,600
31	FA2650807	AGHAPY PHARMACY INC	RIVERSIDE	SAN JACINTO	CA	92583	1,500
32	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	HARRIS	HOUSTON	TX	77006	1,500

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 00228-2879-11)							
January 1, 2012 to June 30, 2012							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000326	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	628,100
2	BA3438508	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128	400,200
3	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	279,200
4	FD0298207	DUANE READE	NEW YORK	NEW YORK	NY	10003	265,200
5	BF96499508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919	227,400
6	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	193,800
7	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	165,600
8	BW4963977	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89030	156,100
9	BW5108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816	154,600
10	BW6630380	WAL-MART PHARMACY 10-2627	HILLSBOROUGH	TAMPA	FL	33612	154,300
11	FR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	MOGALUSA	LA	70427	151,600
12	AK3221140	KEANSBURG DRUGS	MORMOUTH	KEANSBURG	NJ	07734	149,100
13	BW6917973	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89032	143,500
14	BR0875040	HAPPY HARRY'S INC.	NEW CASTLE	WILMINGTON	DE	19806	143,400
15	BR583169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	138,700
16	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	137,700
17	FR1106984	HOPKINS PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19128	136,800
18	AW3732119	WALGREEN ARIZONA DRUG CO.	PIMA	TUCSON	AZ	85712	136,600
19	BW2421707	WALGREEN CO.	CLARK	LAS VEGAS	NV	89107	134,800
20	FR0825513	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	OH	45069	132,900
21	BR4285309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614	132,900
22	BW4286622	WALGREEN CO.	CLARK	LAS VEGAS	NV	89108	132,800
23	BW4319338	WALGREEN CO.	BLOUNT	ALCOA	TN	37701	132,300
24	BW3737791	WALGREEN CO.	CLARK	LAS VEGAS	NV	89121	131,000
25	BR0822997	WALGREEN CO.	DRANGE	ORLANDO	FL	32812	129,600
26	BR7719794	BIAYORA PHARMACY	MIDDLESEX	PERTH AMBOY	NJ	08861	128,600
27	BW642656	WALGREEN EASTERN CO., INC.	SUFFOLK	SELDEN	NY	11784	120,100
28	BD1649975	DISNEY PHARMACY SERVICES	KNOX	POWELL	TN	37849	119,700
29	FW1672422	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10305	116,500
30	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	115,100
31	BW885658	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10312	114,700
32	AW5430943	WALGREEN CO.	PARASOTA	PARASOTA	FL	34233	113,800
33	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	112,100
34	BT6419063	THE HOMETOWN PHARMACY	LAWRENCE	NEW CASTLE	PA	16101	111,000
35	BW7249623	WALGREEN CO.	CLARK	LAS VEGAS	NV	89106	110,800
36	BP9744524	PRESCRIPTION SOLUTIONS BY OPTUMRX	SAN DIEGO	CARLSBAD	CA	92010	110,800

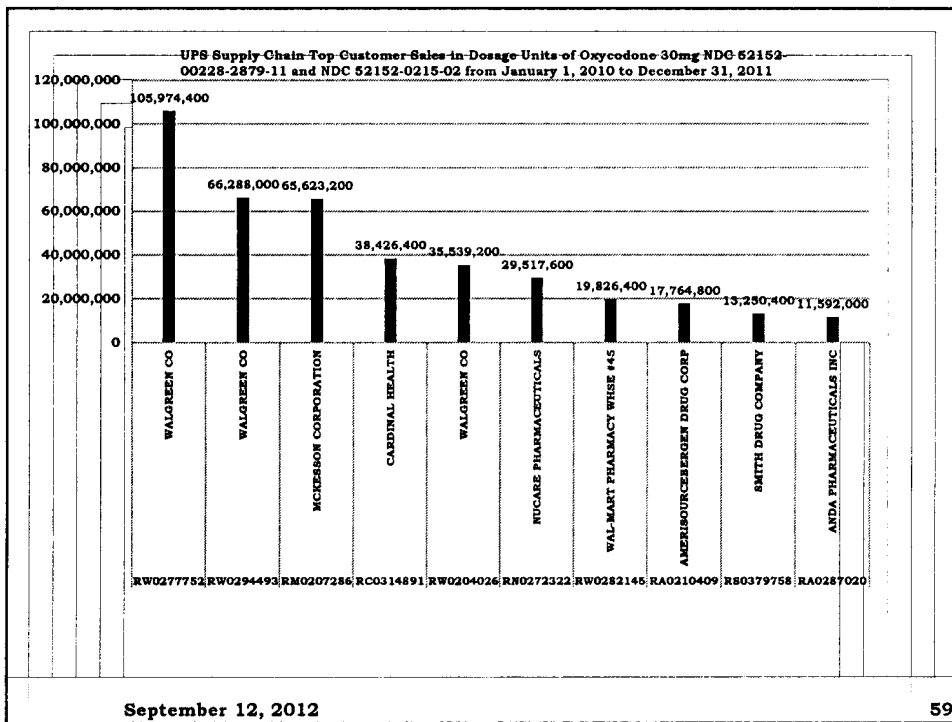
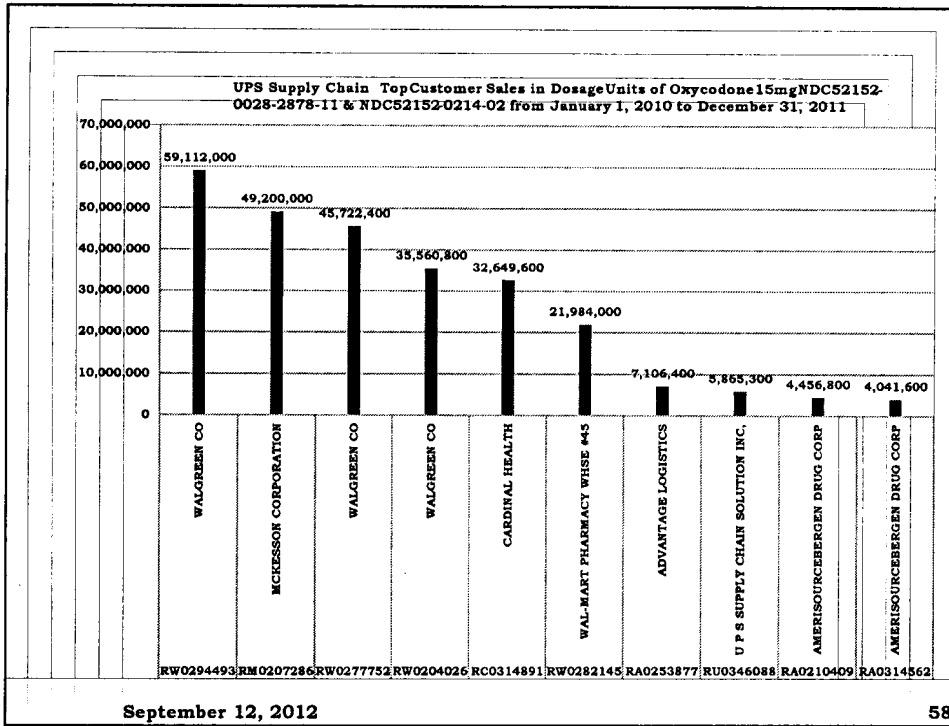
The following charts and graphs have been compiled from ARCOS reports your firm has previously submitted to DEA. The data was reviewed and the purchases of a few of your customers will be addressed during our discussion.

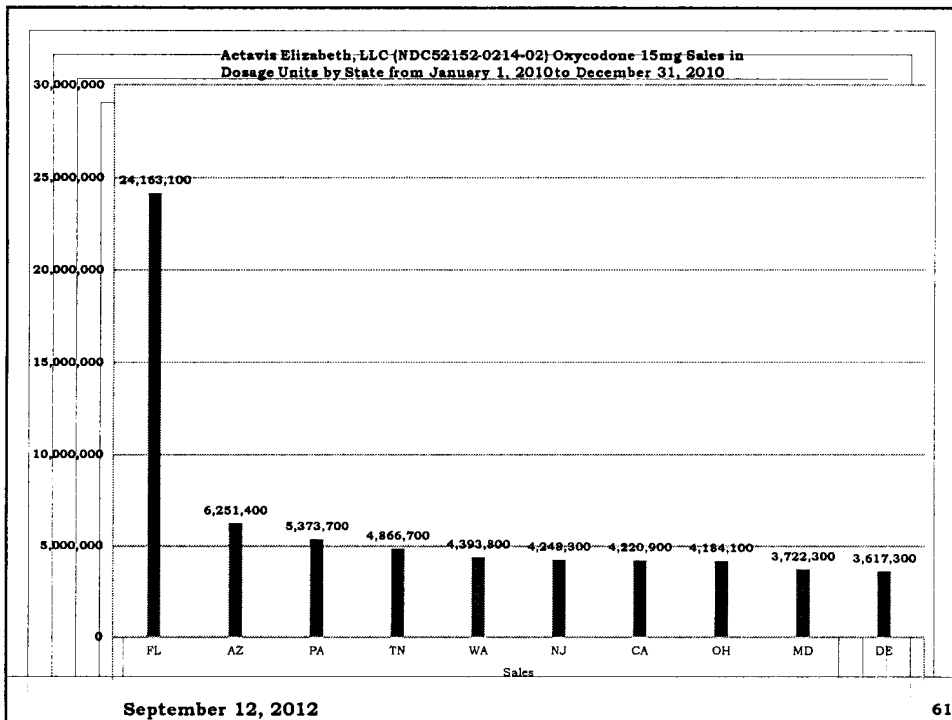
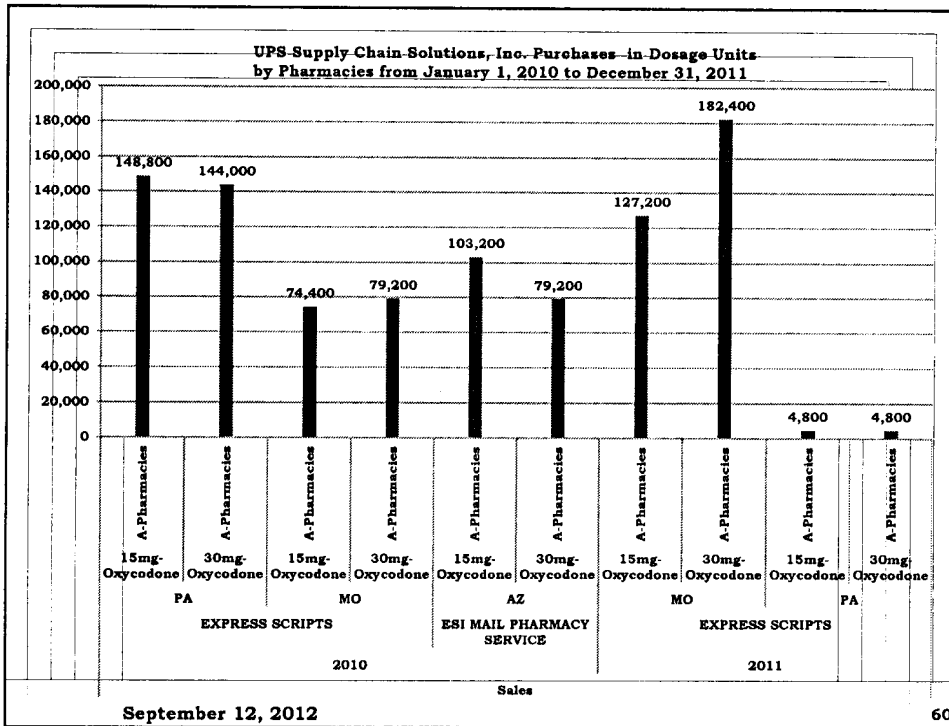
The mentioning of specific customers is NOT to be implied that the sale of controlled substances to these customers is illicit or that they may be involved in illicit activities.

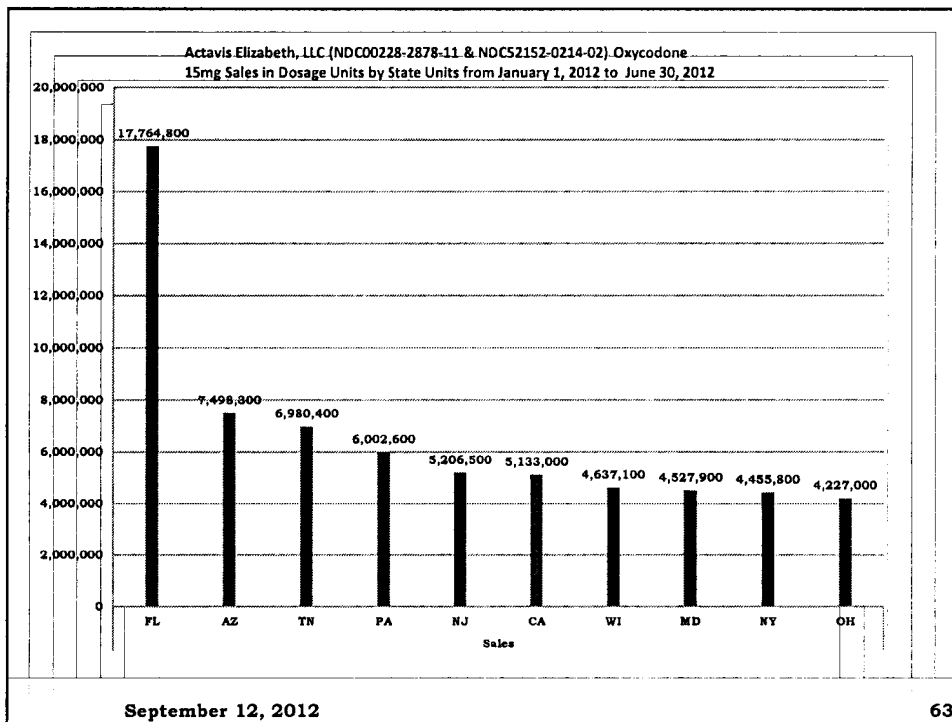
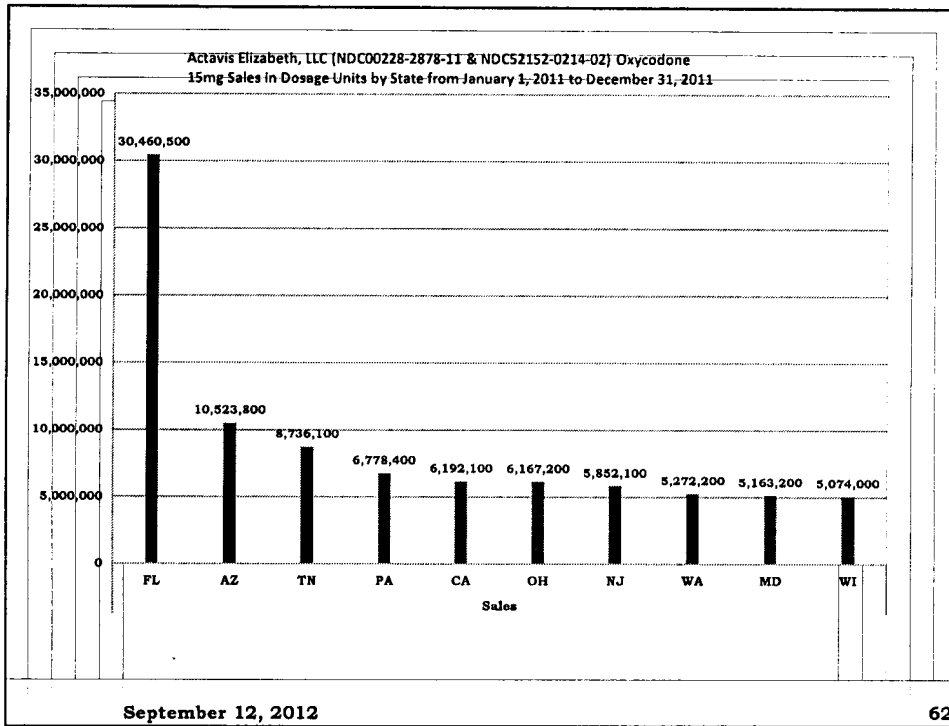
It also should NOT be inferred that based upon the documentation provided to you that your company should terminate or restrict business with any customer discussed for the purposes of this presentation.

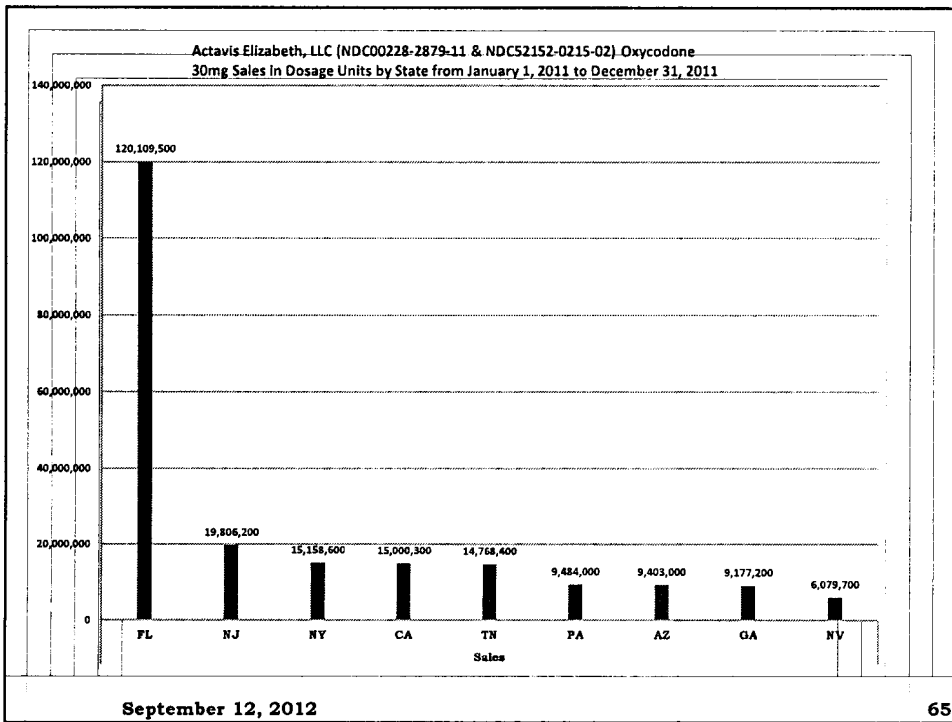
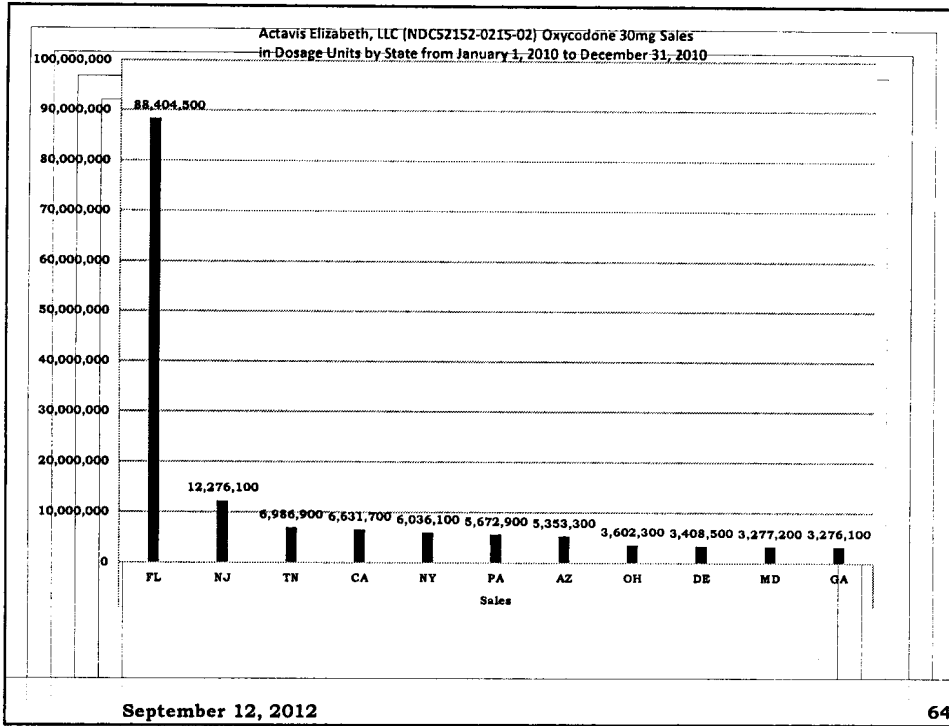
It is incumbent upon you to know your customers, fully review all orders for controlled substances and to exercise due diligence procedures prior to deciding whether or not to terminate or restrict sales to any customer.

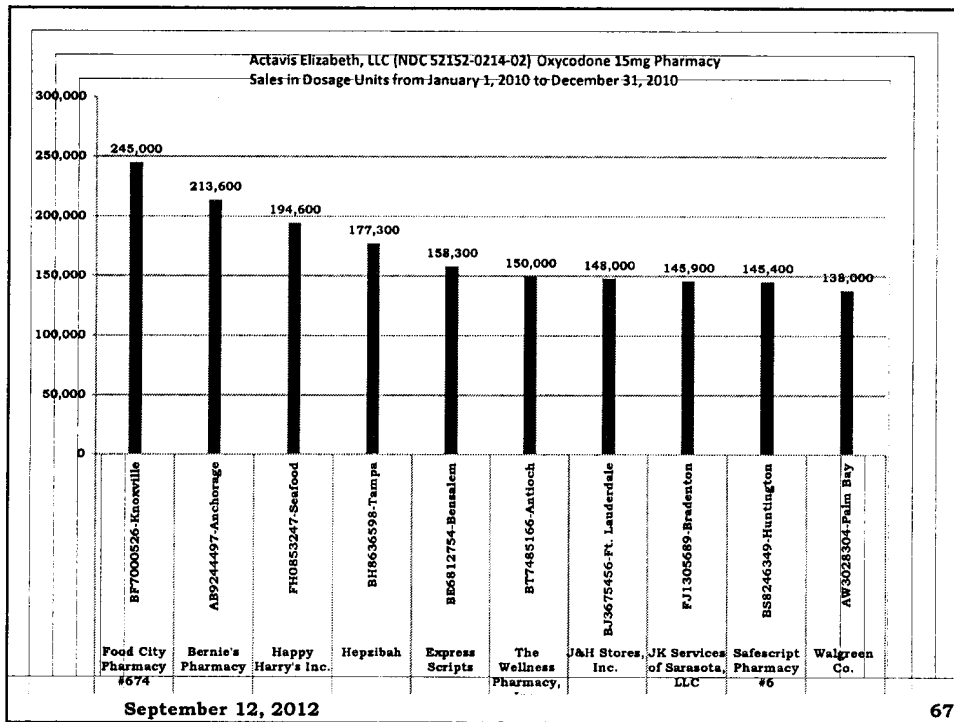
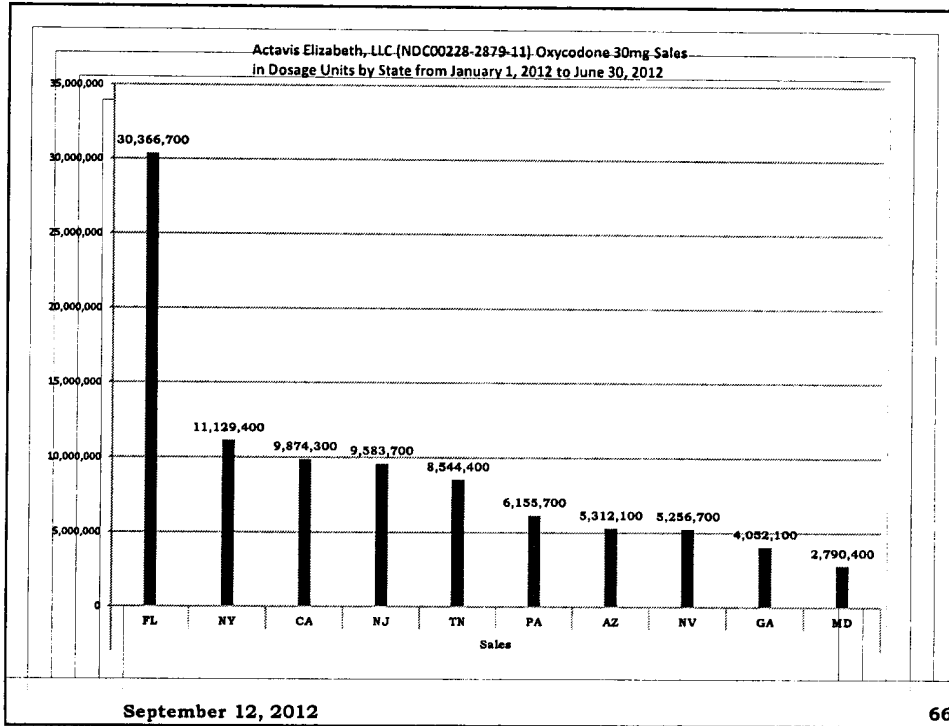


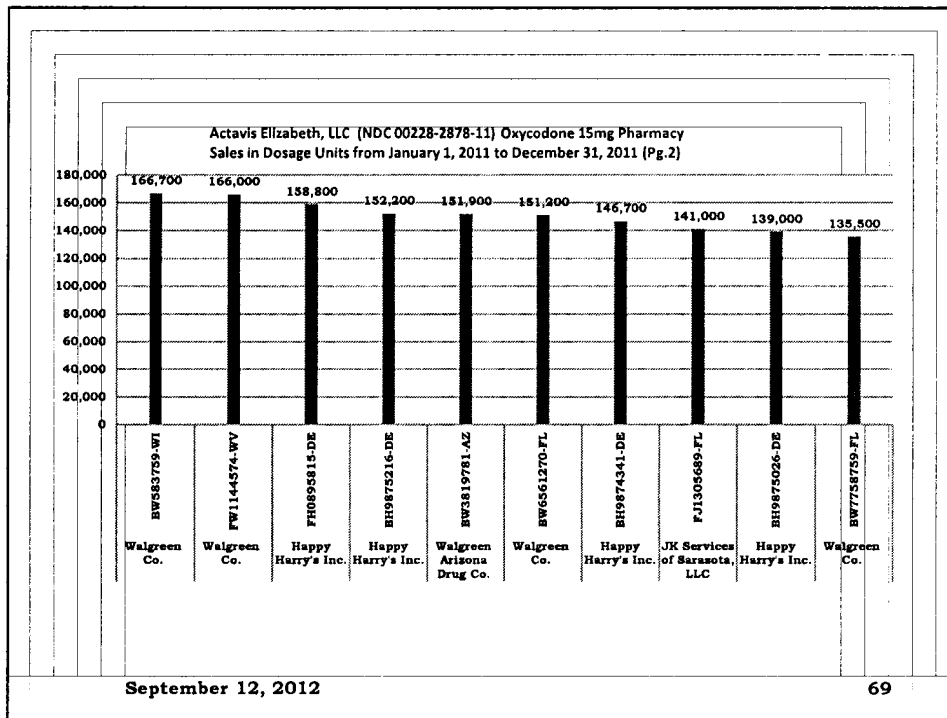
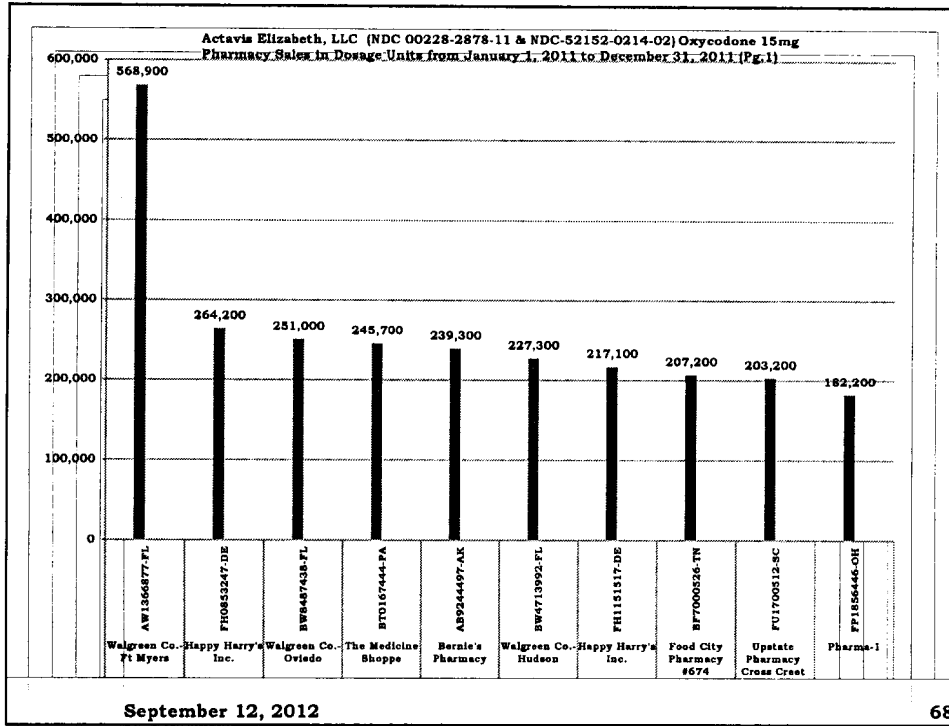


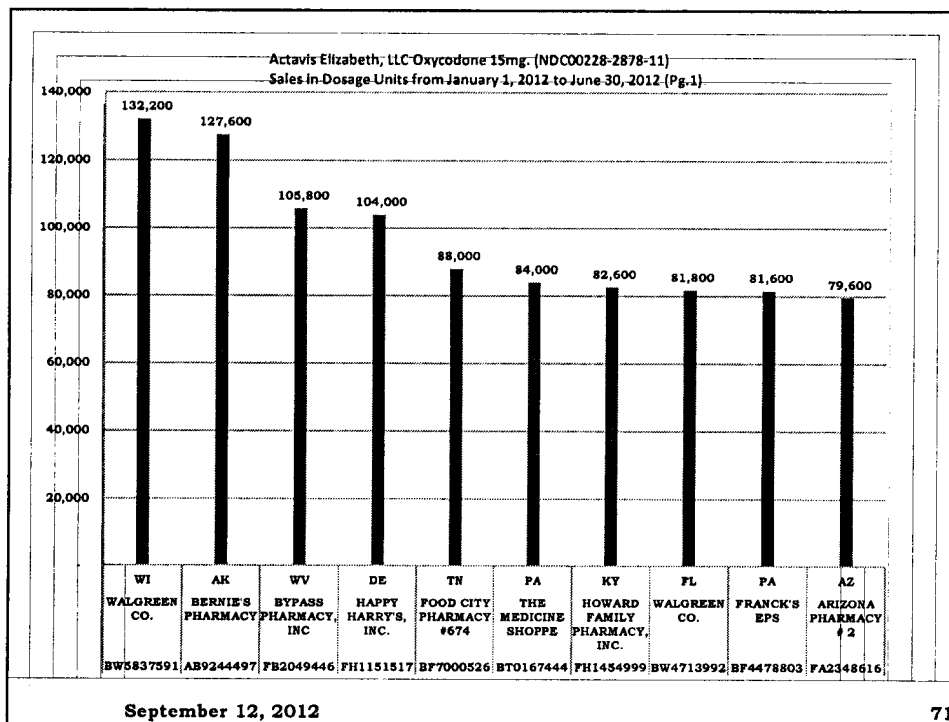
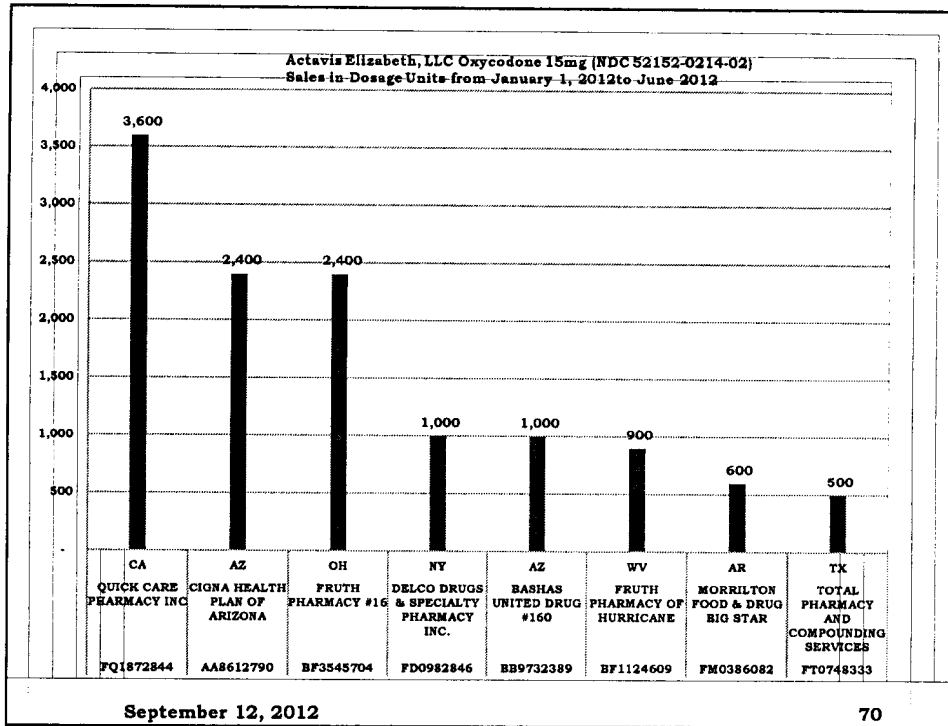


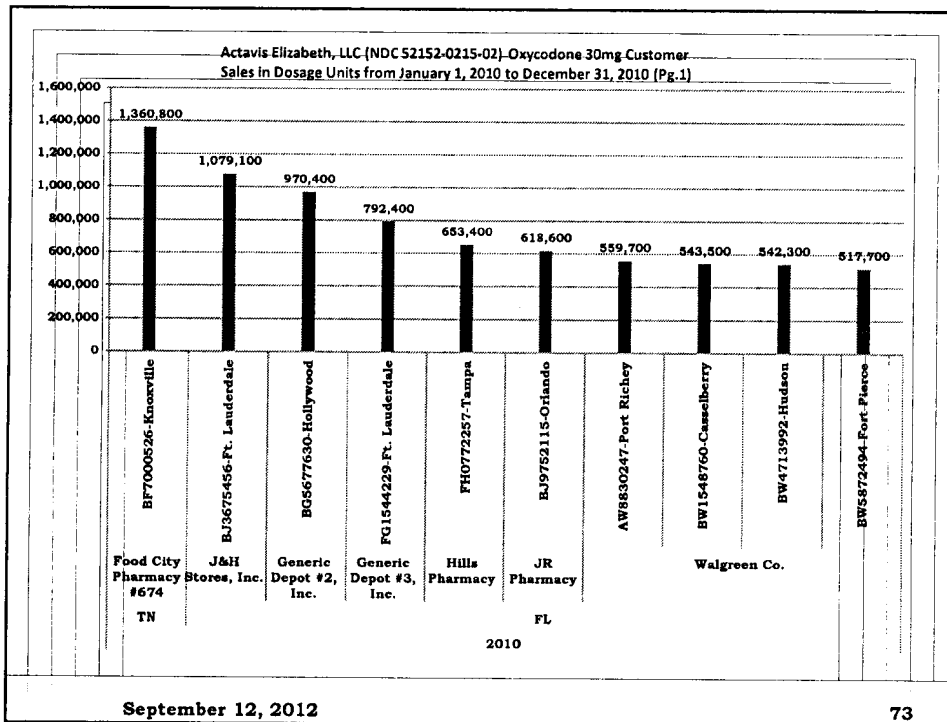
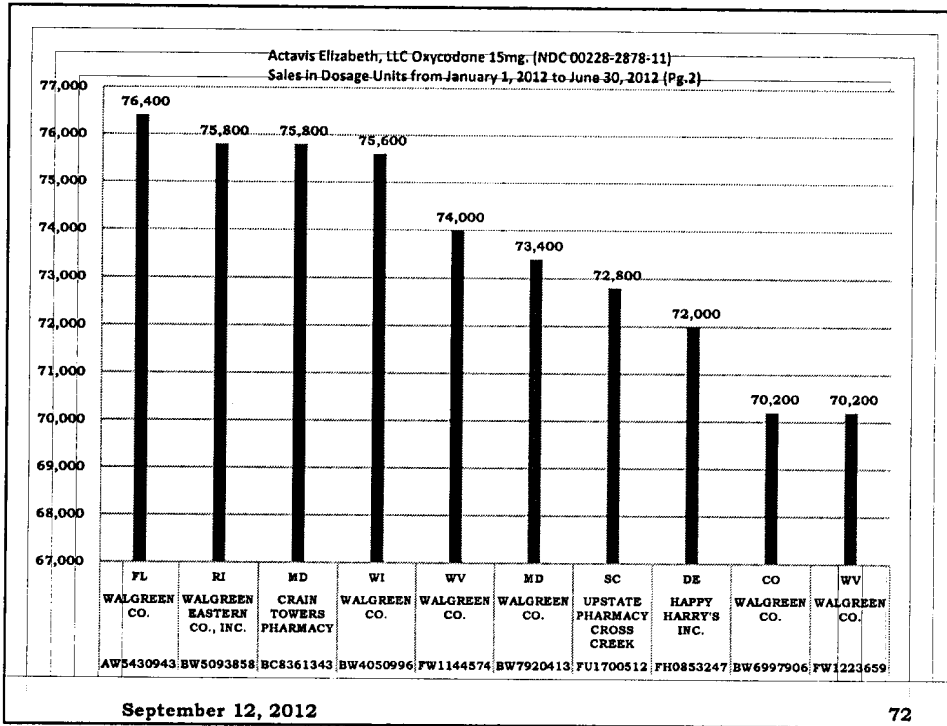




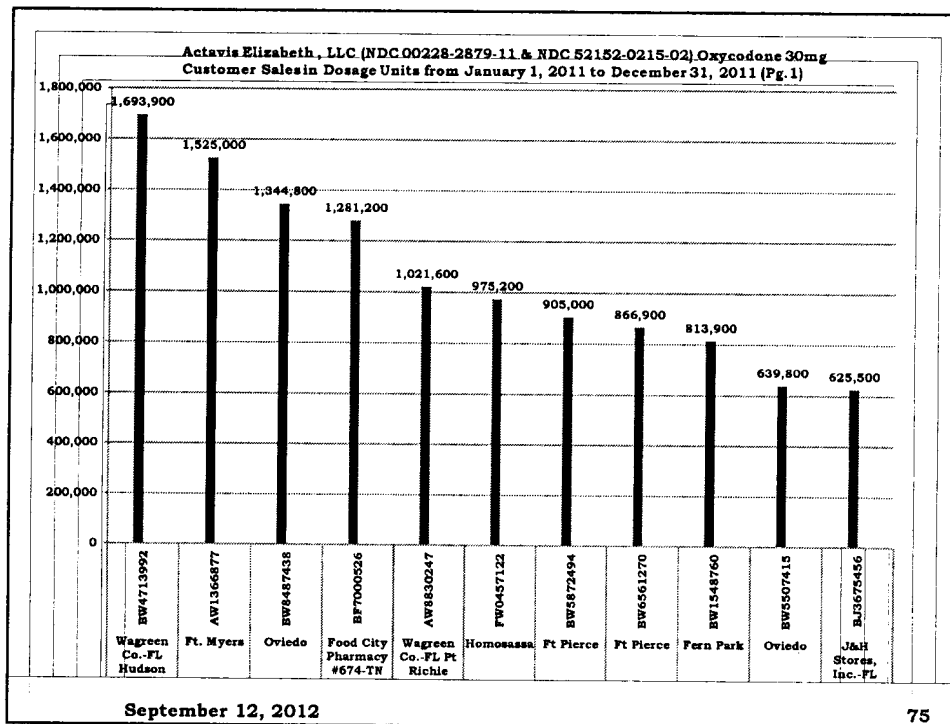
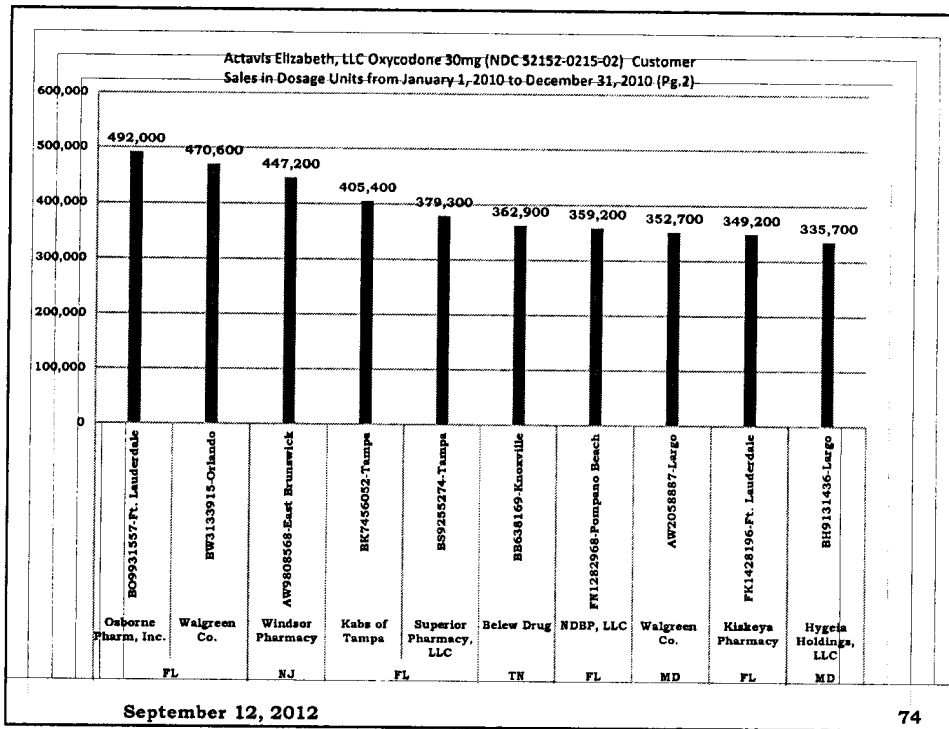


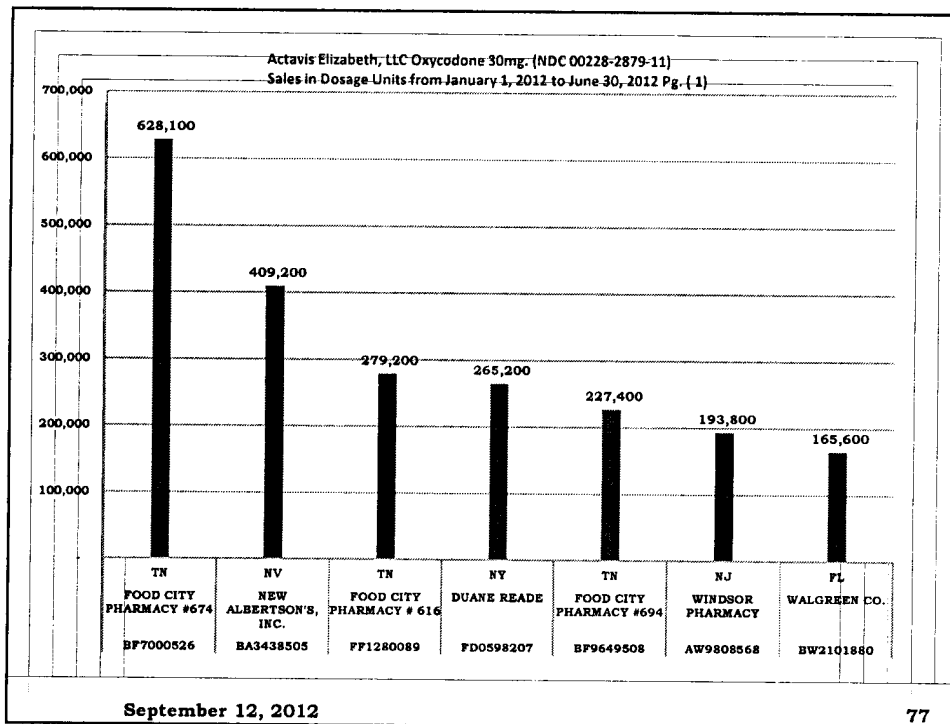
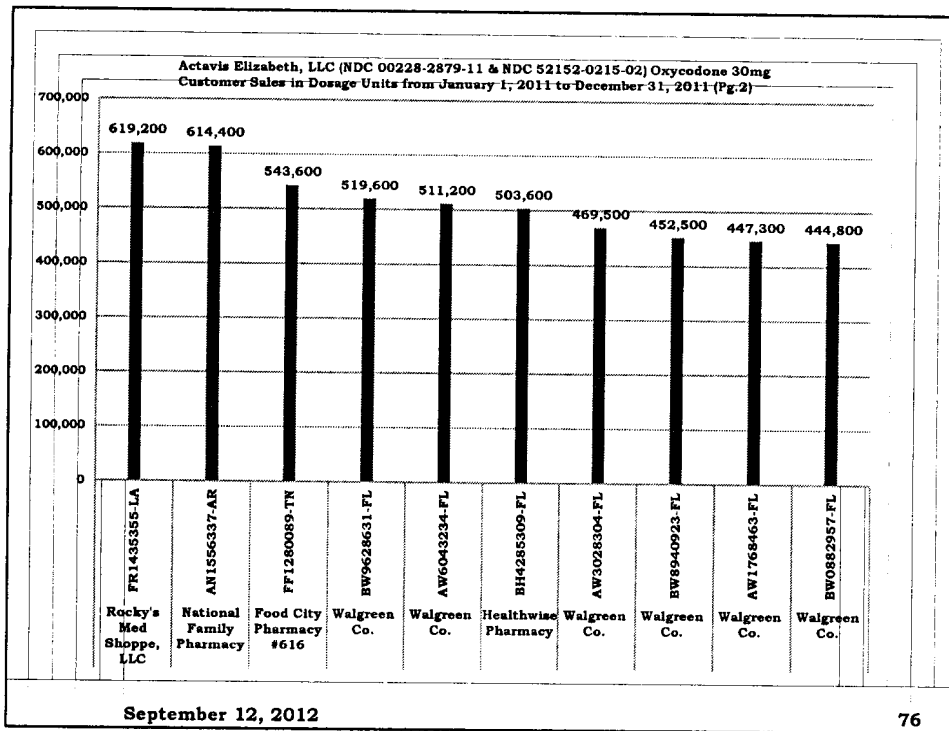


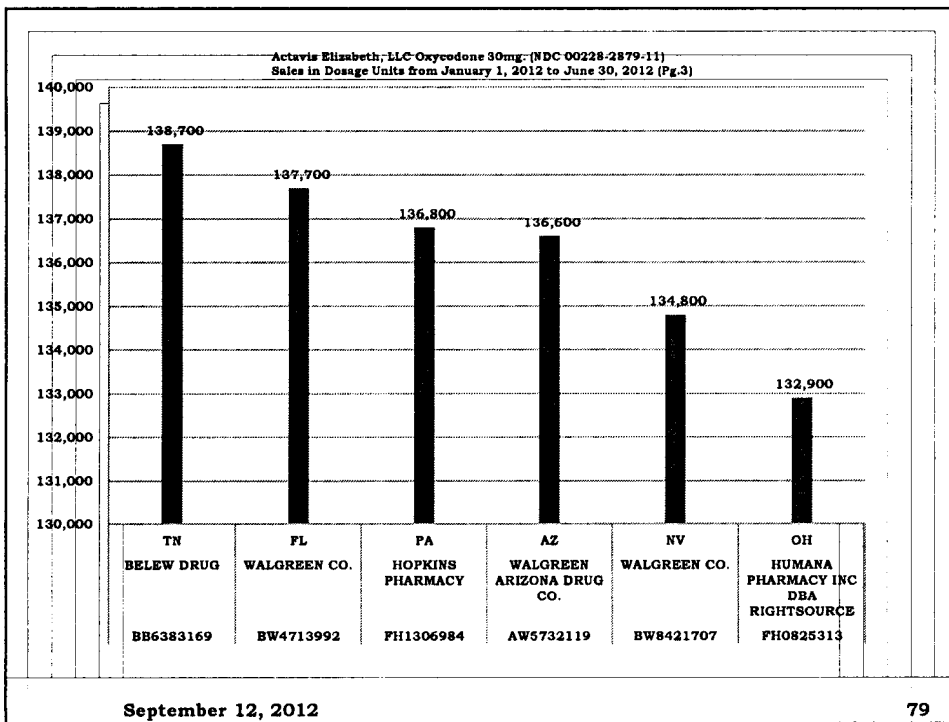
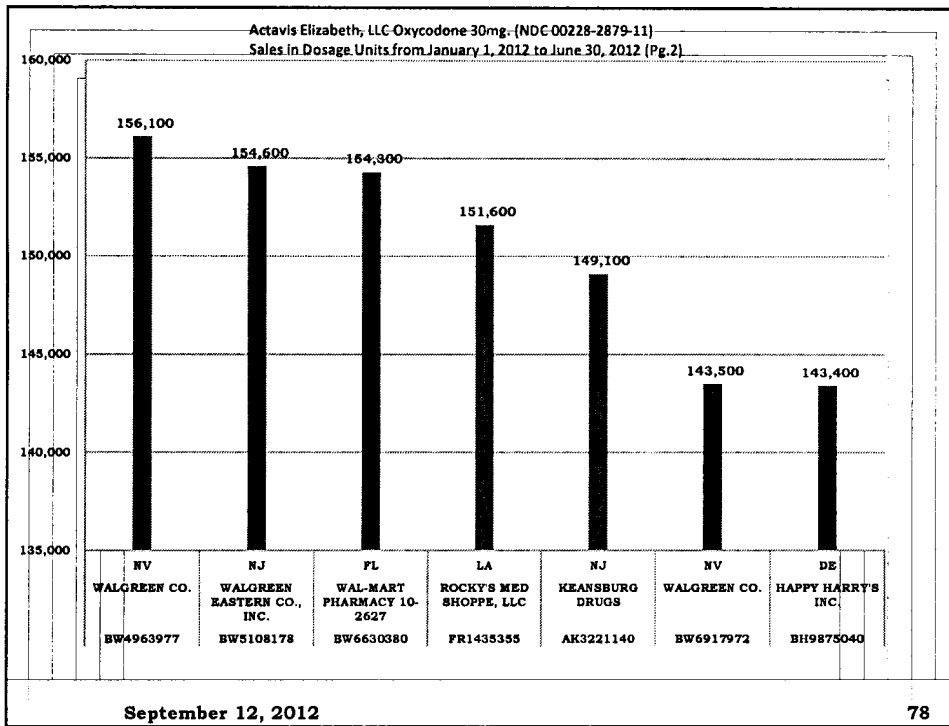


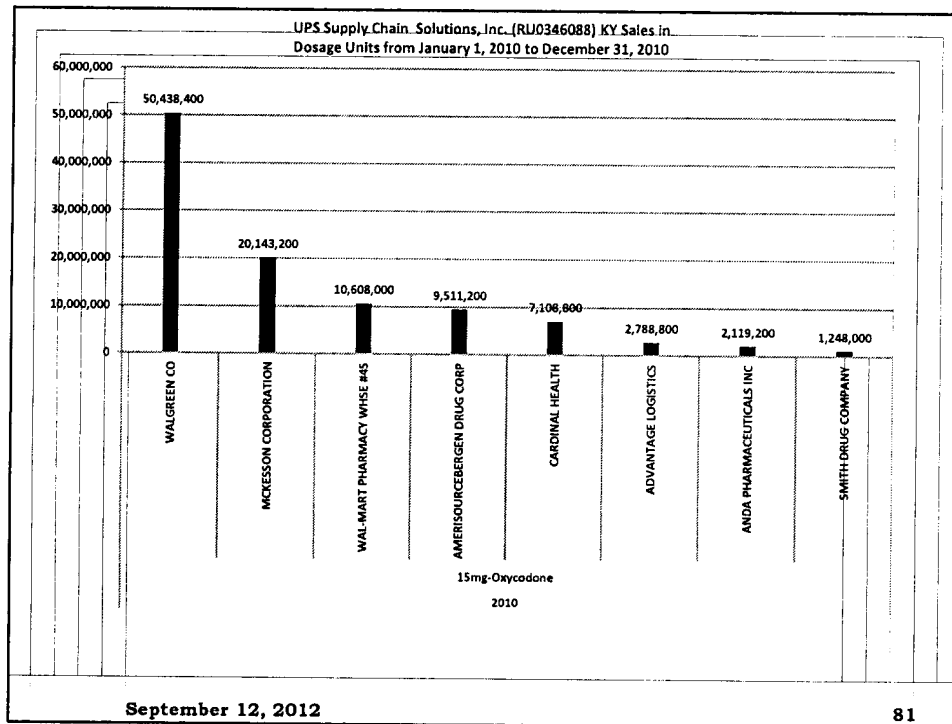
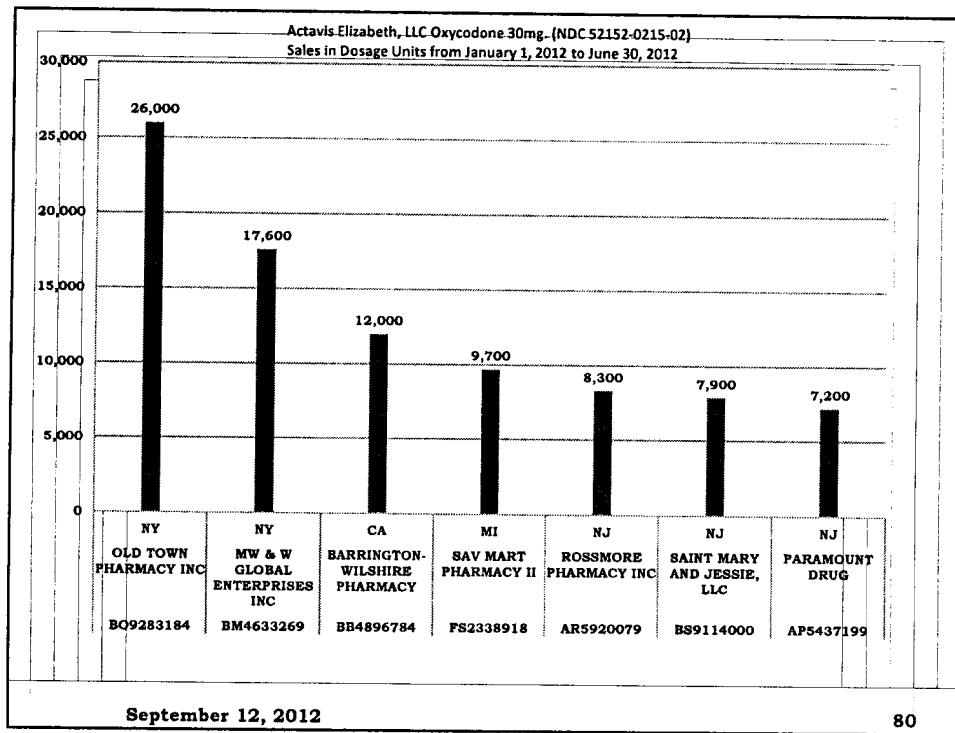


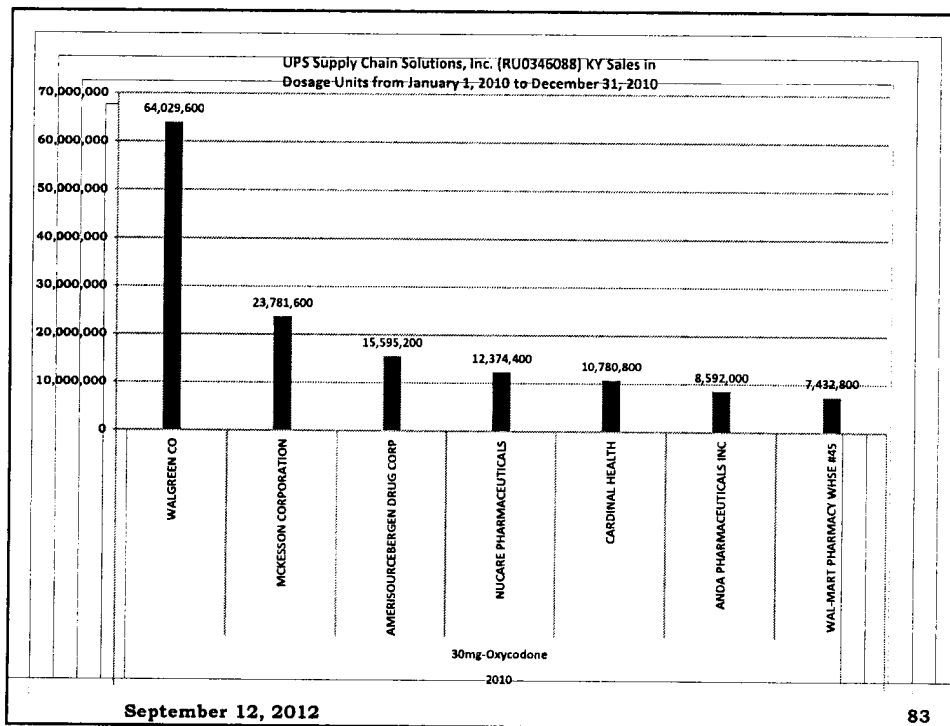
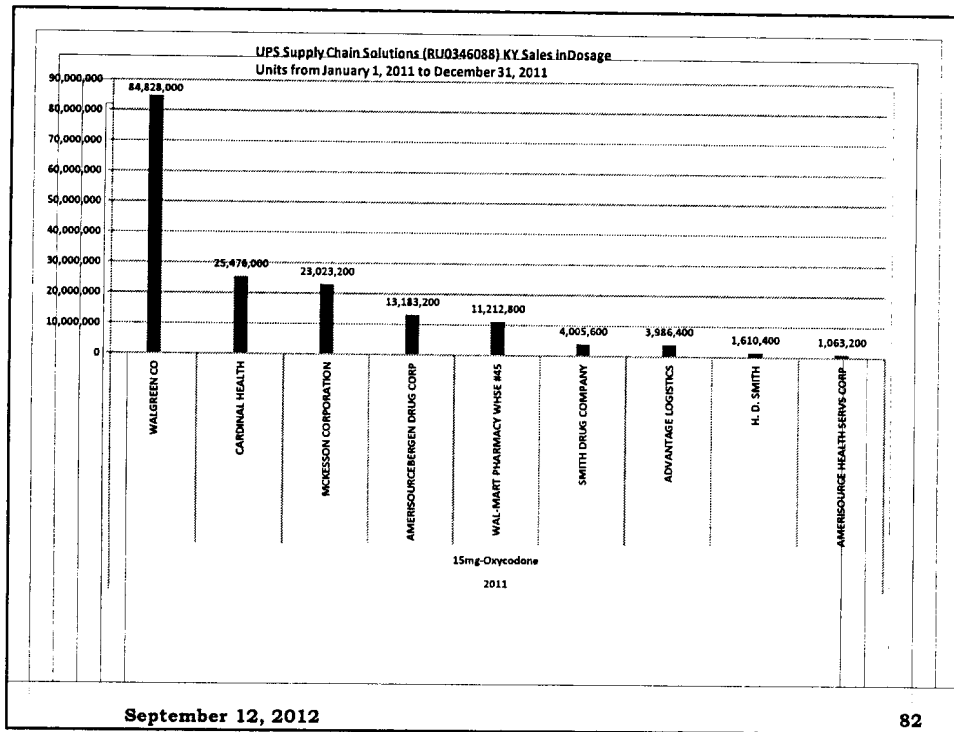


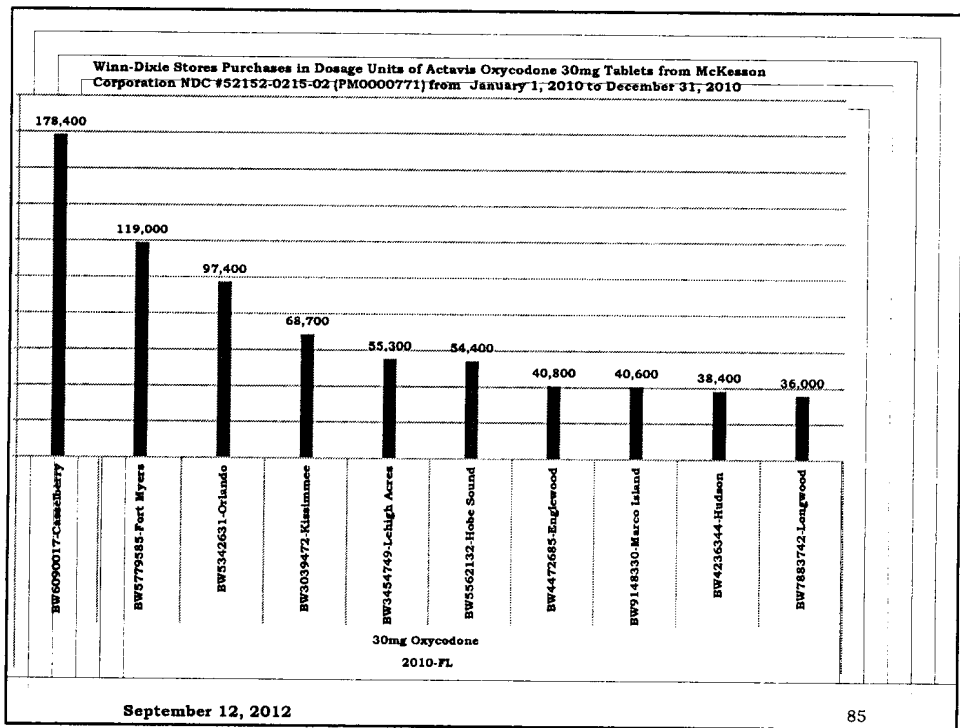
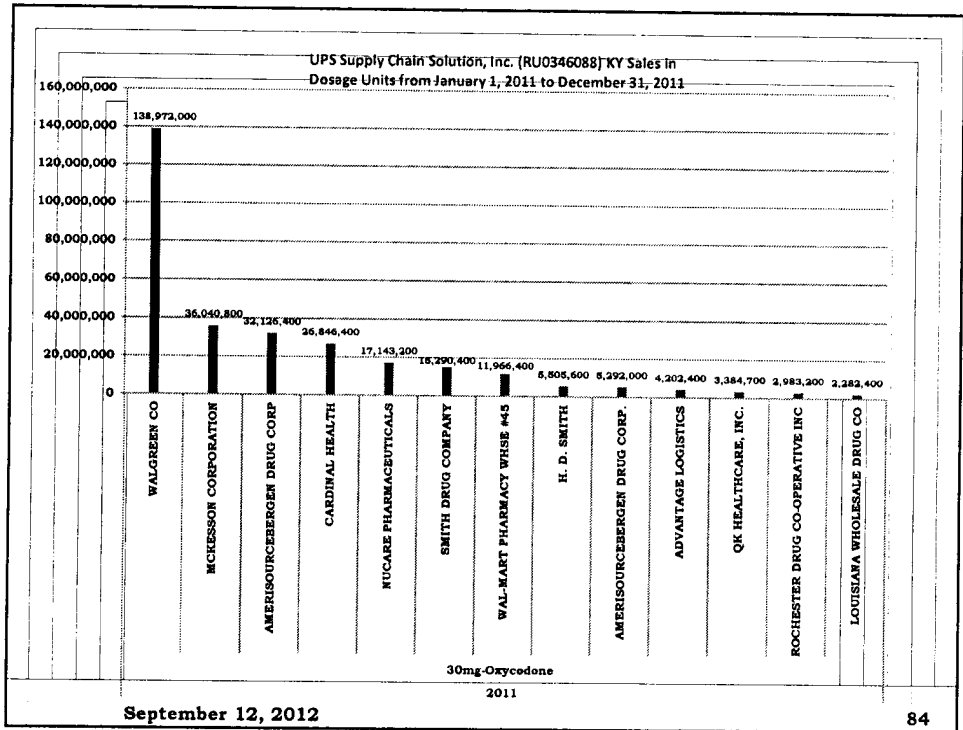


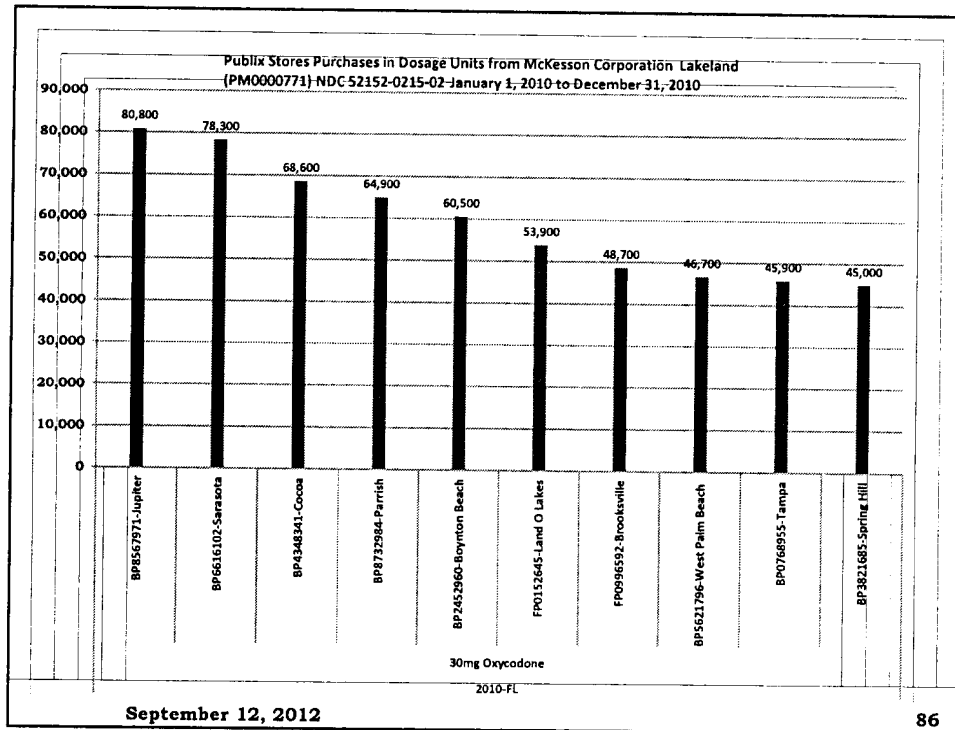




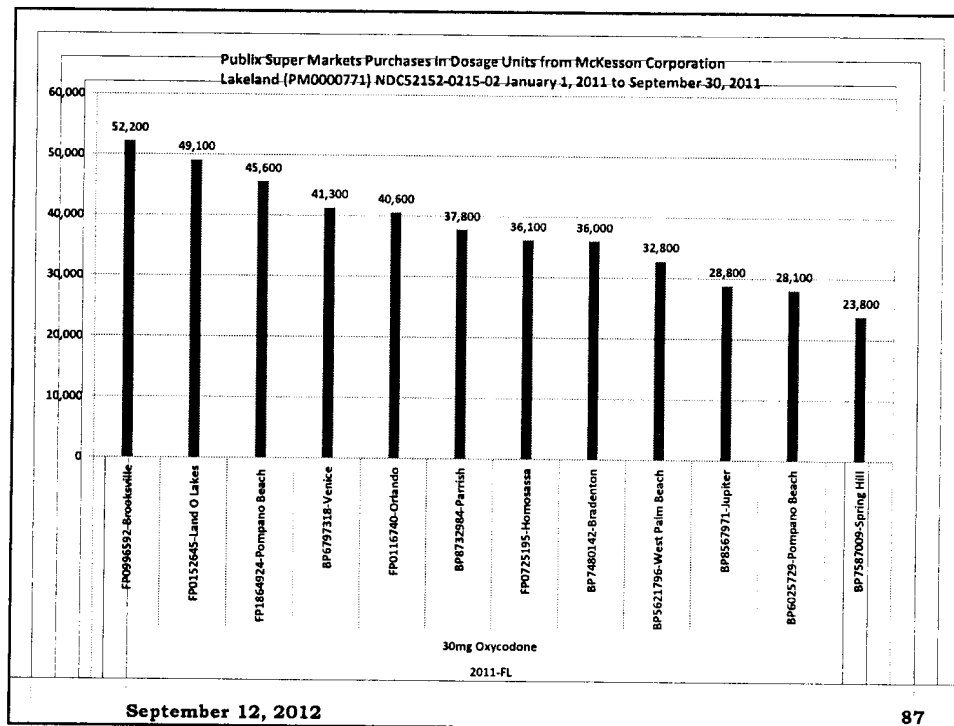




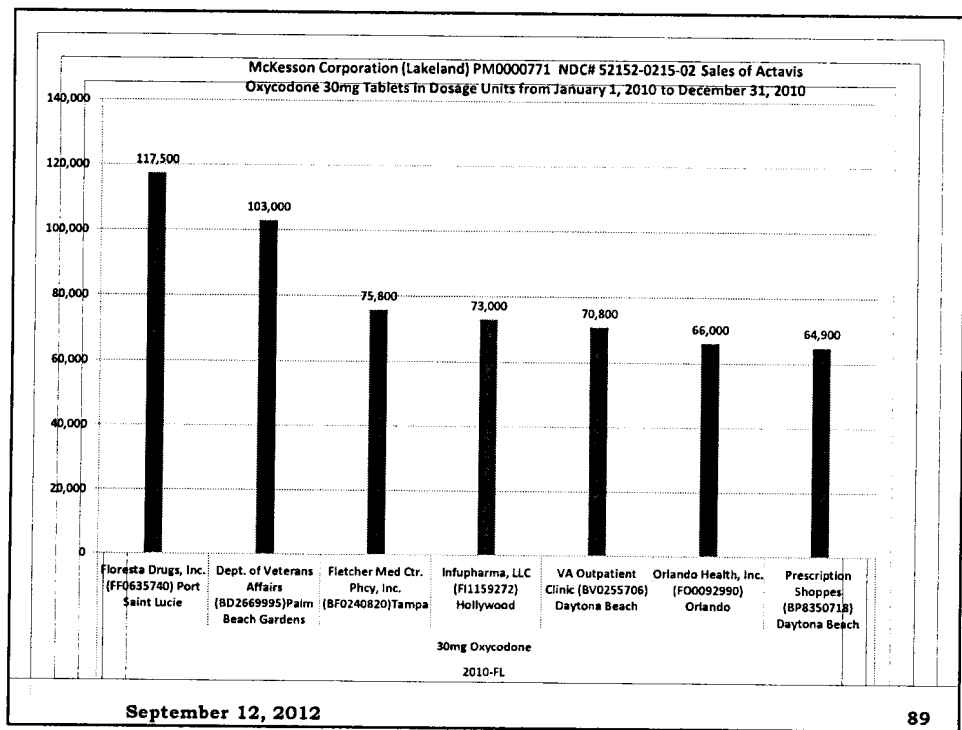
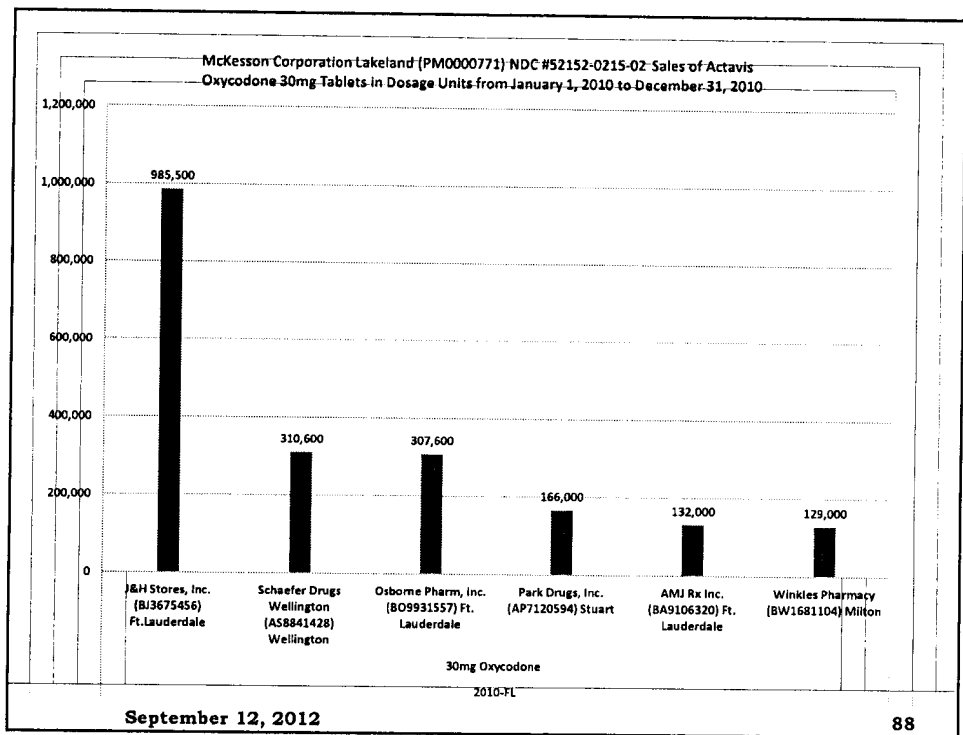




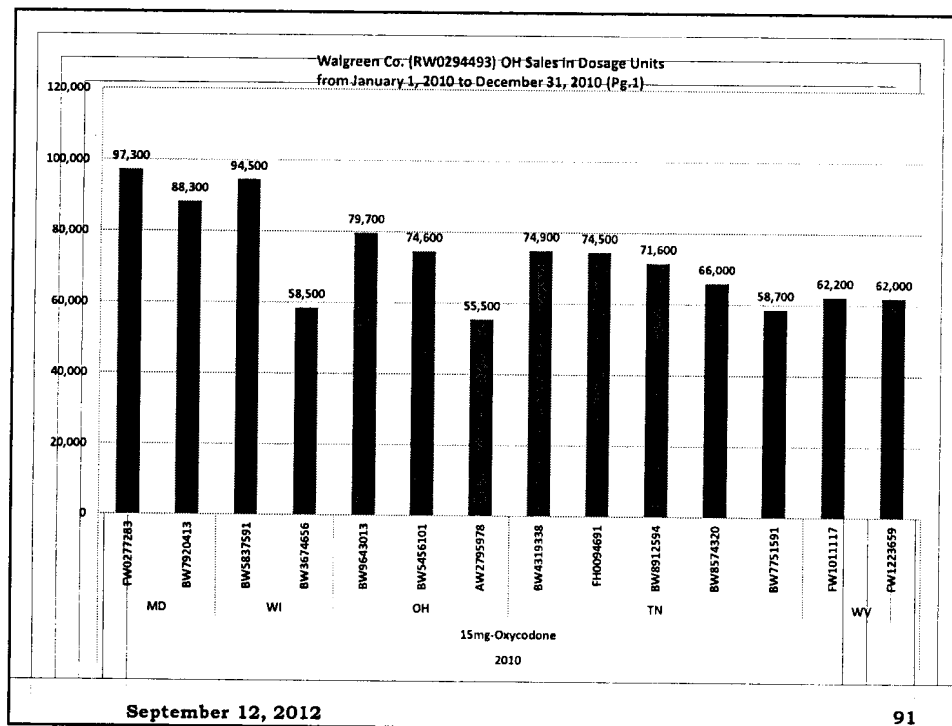
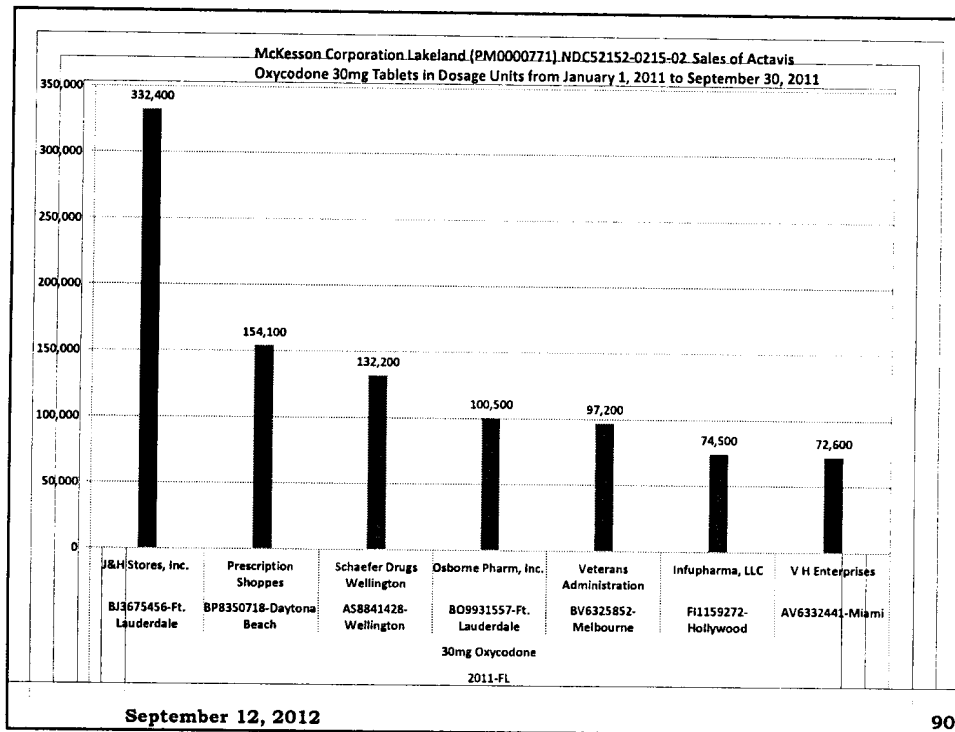
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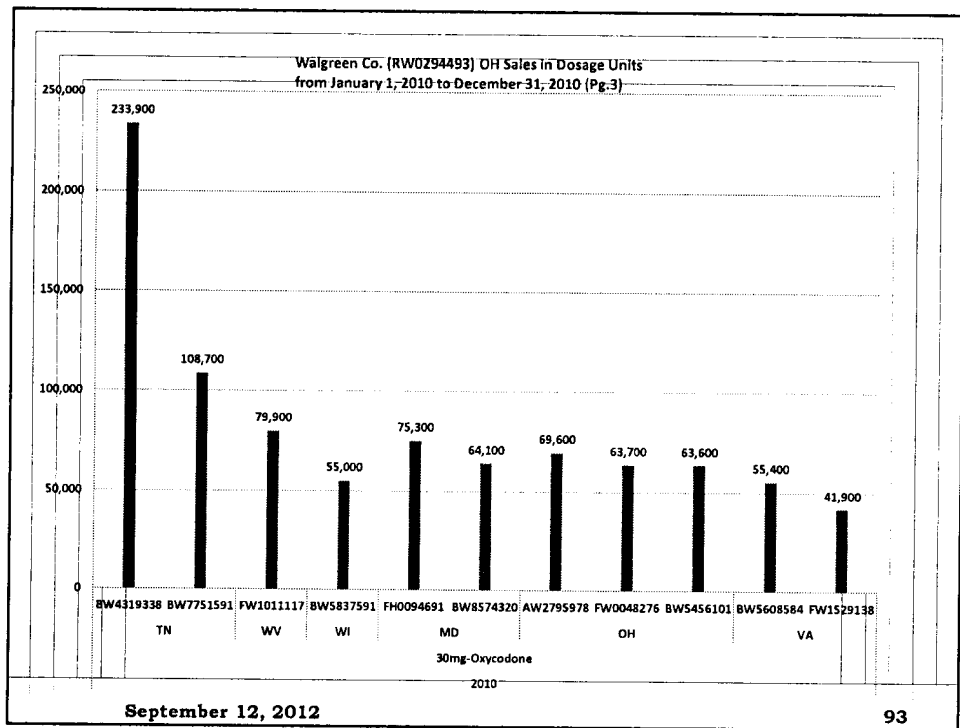
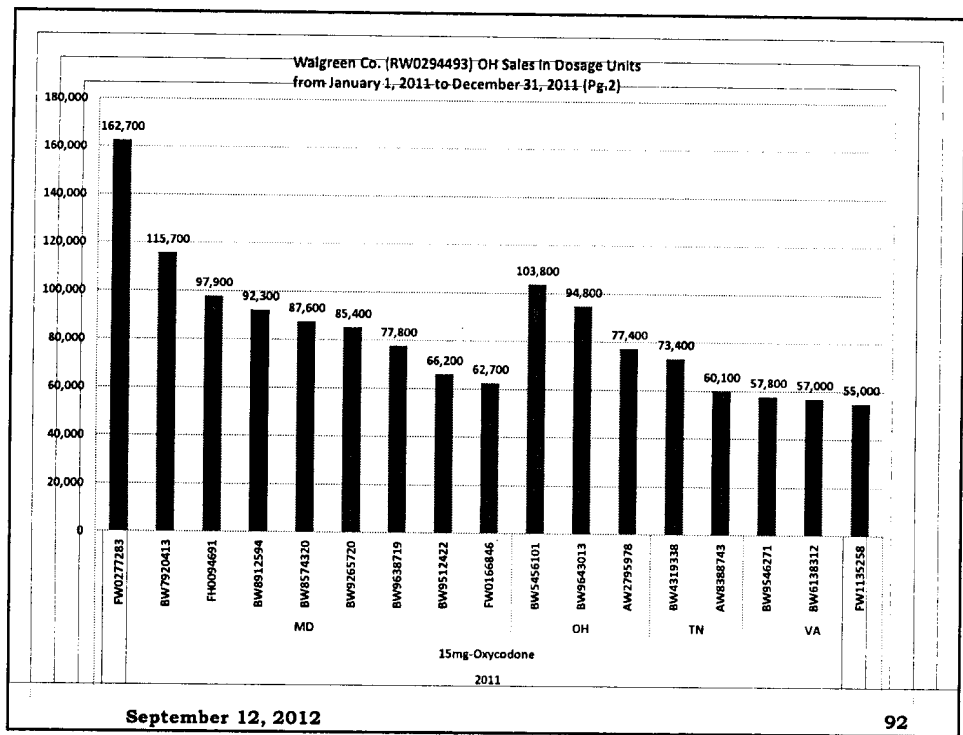


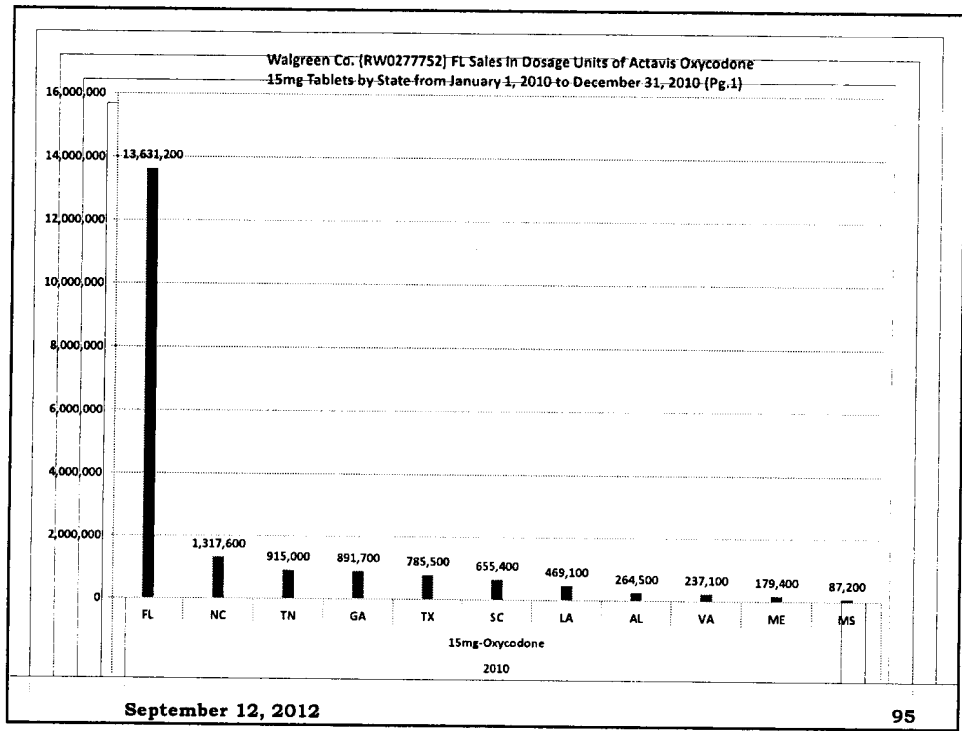
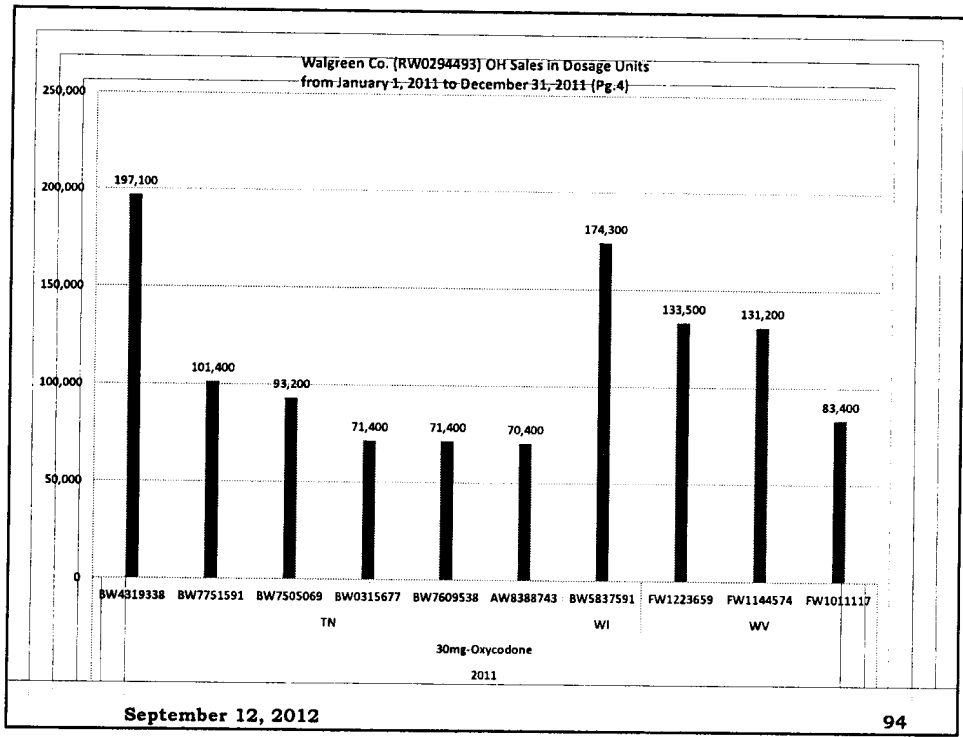
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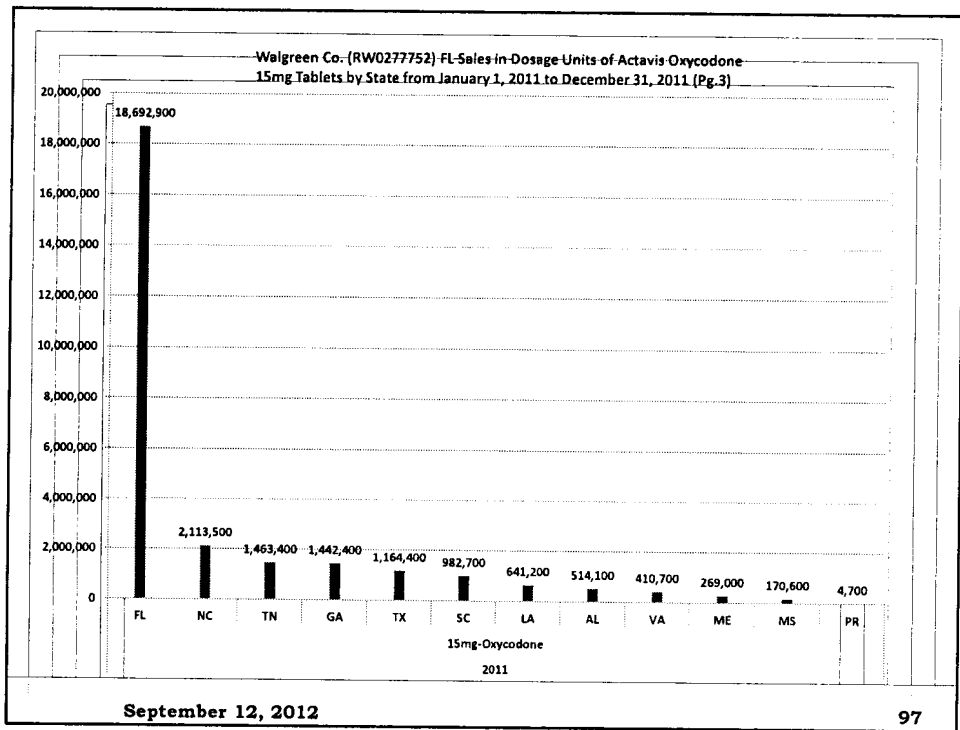
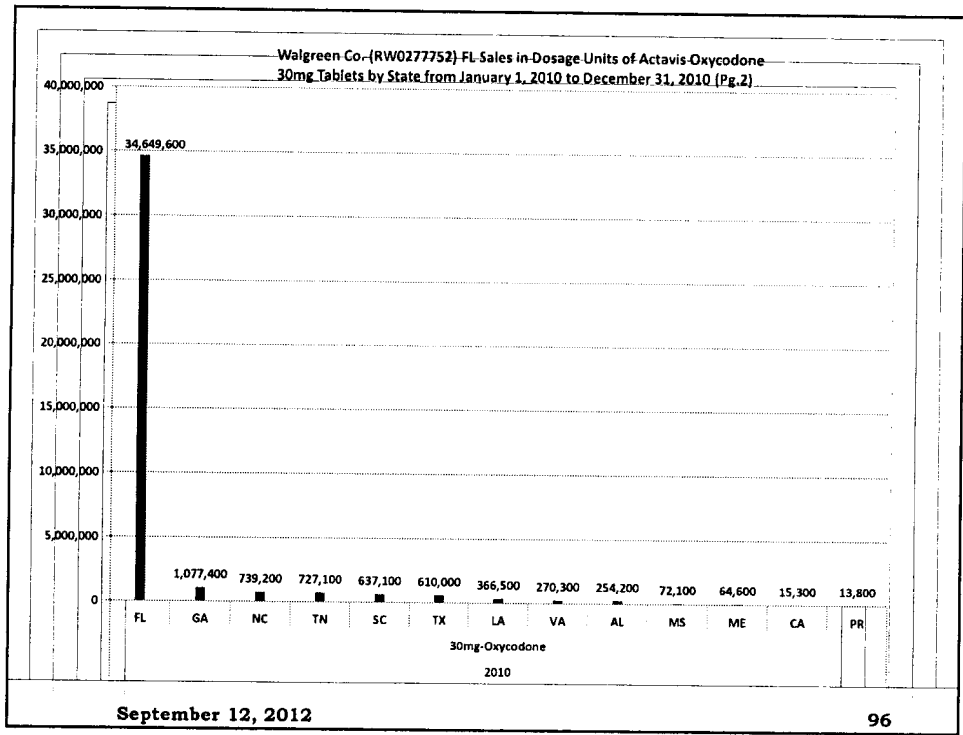


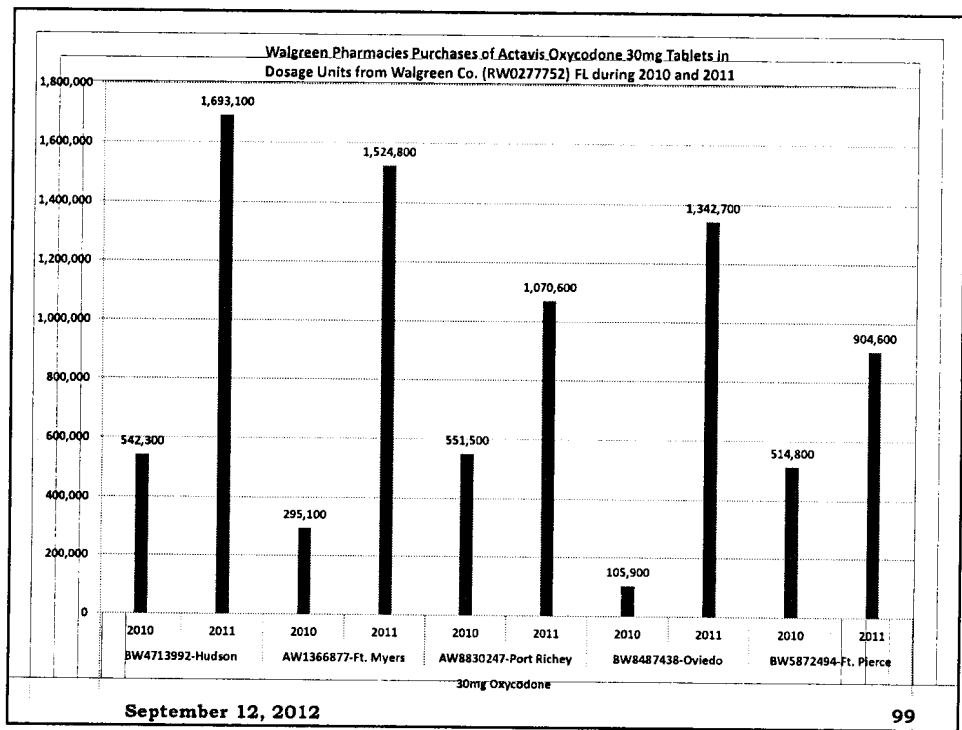
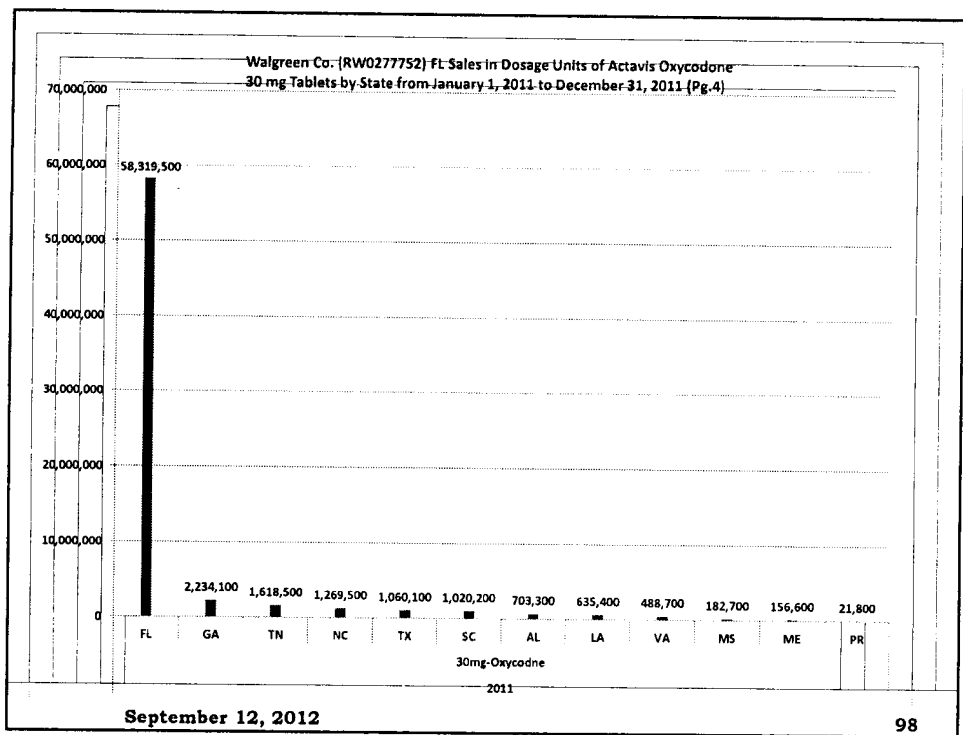


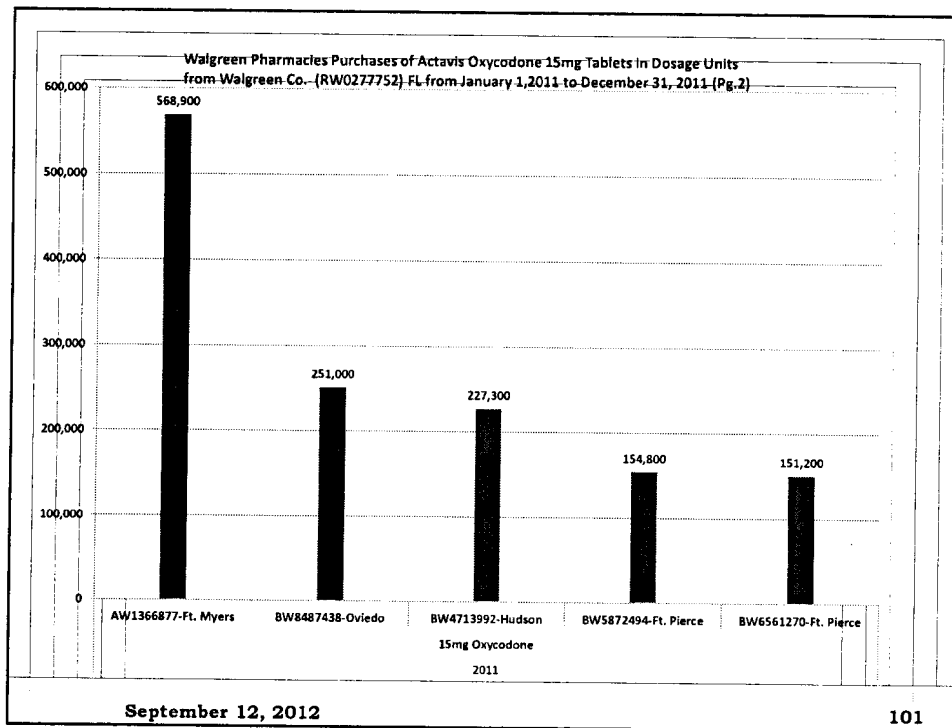
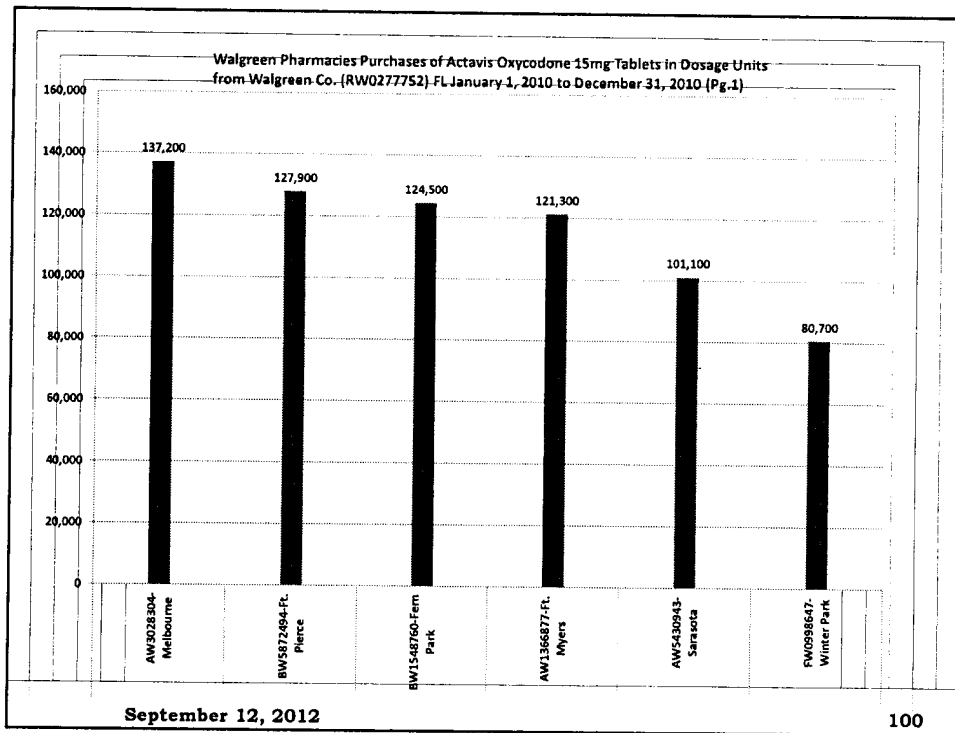


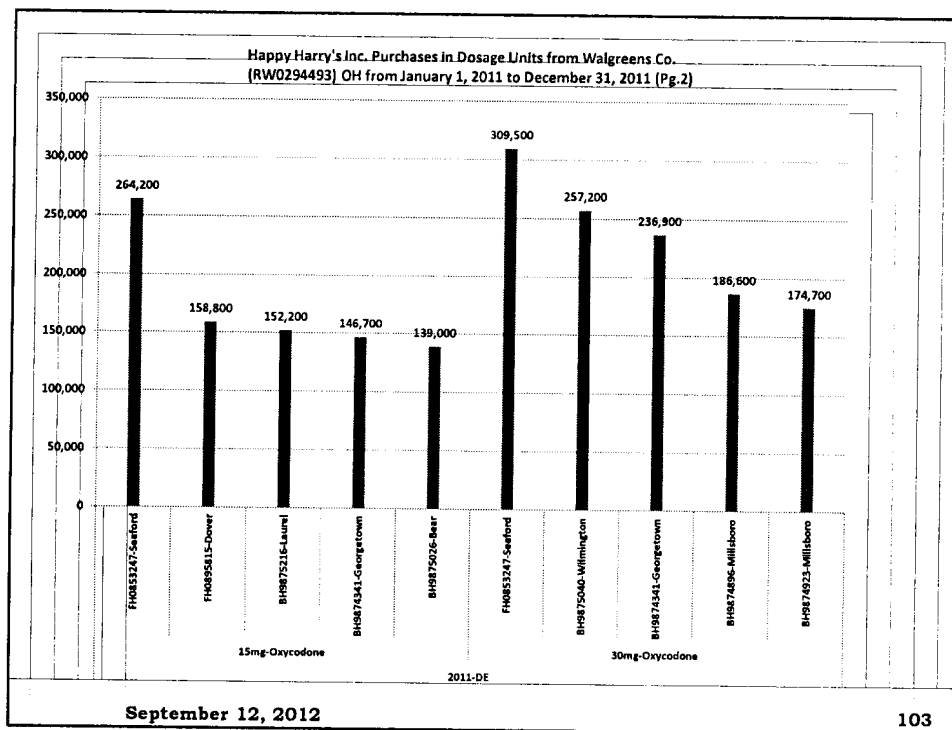
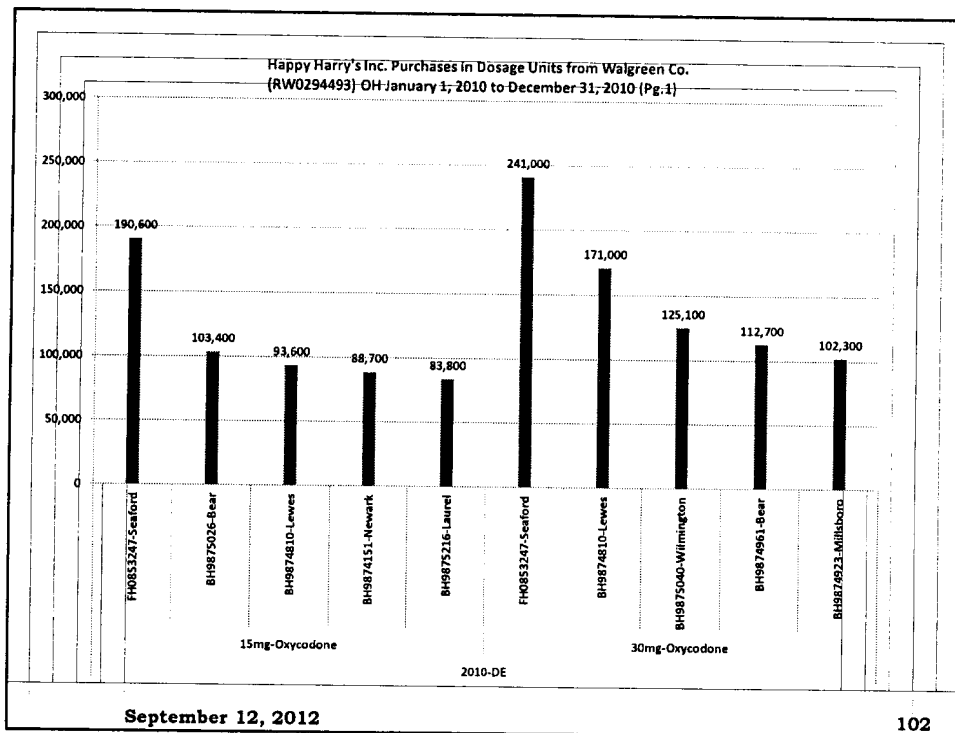












## Suggested Questions a Distributor should ask prior to shipping controlled substances.

This list of questions is not intended to be all inclusive nor should it be interpreted that every situation or registrant activity is covered. This questionnaire is provided to assist the distributor to formulate a better understanding of who their customers are and whether or not they should sell to them controlled substances. It is incumbent upon you, the distributors, to ensure that sales to your customers are for legitimate purposes. It is further incumbent upon you to identify illicit or suspicious activities which may result in the diversion of controlled substances.

The use of this questionnaire should not be construed in any manner to be a mechanism or means that you have fully met the criteria and actions required by 21 USC 823 or other state and federal laws that are applicable.

### Possible questions for a pharmacy:

- Does the pharmacy fill prescriptions via the Internet? If so, is the pharmacy registered with the DEA under the Ryan Haight Act?
- Is this a mail order pharmacy (fills prescriptions for insurance, etc.)?  
**Note:** A pharmacist may claim to be mail order pharmacy but may actually be operating as an Internet pharmacy. Do not accept the response to this question at face value.
- Is the pharmacy licensed in all states for which it mails or fills prescriptions?
- Does the pharmacy report to all states that have prescription monitoring programs in which their customers reside and to whom they dispense?
- Does the pharmacy provide services for any specialty customers such as Long Term Health Care, Hospice Centers, Assisted Care Living Facilities, etc.?
- Does the pharmacy have staff or a private firm that solicits practitioners to get more business?
- What is the pharmacy's ratio of controlled vs. non-controlled orders?
- Does the pharmacy order a full variety of controlled substances and are they fairly evenly dispersed? If not, why the disparity?
- What are the hours of operation of the pharmacy?
- Does the pharmacy offer a full assortment of sundries to its customers (e.g., aspirin, snacks, cosmetics, etc.)?
- Does the pharmacy have security guards on the premises? If so, why?
- What methods of payment does the pharmacy accept (cash, insurance, Medicaid, and in what ratios)?
- Who is the pharmacy's primary supplier?
- Does the pharmacy order from other suppliers as well? If so, why and what controlled substances?
- If this is a new account, why does the pharmacy want you to be their supplier?



- If you are not the only supplier, what controlled substances will the pharmacy be ordering from you, in what quantities, in what time frame, and will they be ordering these same products from other suppliers?
- What ratio will you be supplying compared to other suppliers?
- Does the pharmacy fill prescriptions for out of state customers? If so, for how many out of state customers does the pharmacy fill (ratio or approximate number)?
- If the pharmacy fills prescriptions for Pain Management or other specialty practitioners (diet, oncology, etc.), is the pharmacist comfortable with the prescribing practices of the practitioner?
- Has the pharmacist questioned or been uncomfortable with, the prescribing practices of any practitioner?
- Has the pharmacy ever refused to fill prescriptions for a practitioner? If so, why and who?
- Are there particular practitioners who constitute most of the prescriptions it fills? Who are these practitioners (Name and DEA registration number)?
- Does the pharmacy have any exclusive contracts, agreements, arrangements, etc., with any particular practitioner, business group, investors, etc.? If so, explain those arrangements and/or obtain copies of those agreements.
- Is the pharmacist comfortable enough with the prescribing practices of any or all practitioners for which they fill, to stake their professional livelihood on it?
- Does the pharmacy supply, order for, or sell to any practitioners or other pharmacies?
- How does the pharmacy sell/transfer controlled substances to other pharmacies or practitioners? Via a prescription, sales invoice, or DEA Form-222? (Transfer by prescriptions is not authorized).

Possible questions for a practitioner:

- What is the practitioner's specialty, if any (family practice, oncology, geriatrics, pain management, etc.)?
- Do the controlled substances being ordered correspond to his specialty or the treatment he provides?
- What method of payment does the practitioner accept (cash, insurance, Medicare) and what is the ratio of each?
- Has the practitioner ever been disciplined by any state or federal authority?
- How many patients does the practitioner see each day? What is his weekly average?
- Does the practitioner prescribe as well as dispense?
- Why does the practitioner prefer to dispense as opposed to prescribe?
- Who was the practitioner's previous supplier? Are they still ordering from this supplier? If not, why are they looking for a new supplier?
- Do the hours of operation and the facility accommodate the type of practice being conducted?
- Does the practitioner's office have security guards on-site? If so, why?

September 12, 2012

- Are all applicable state, federal, local licenses current and are they issued for the registered address at which the practitioner is practicing?
- Does the practitioner see out of state patients? If so,
  - From what states,
  - How many,
  - Approximate ratio of out of state compared to local, and
  - Why, specifically, they travel so far to see him?
- Can the practitioner provide a blank copy of an agreement which they enter into with a patient, specifying the course of treatment, the patient rights and responsibilities, and reasons for termination of treatment?
- Does the practitioner conduct random unannounced drug testing?
- What measures does the practitioner employ and/or monitor to prevent addiction and diversion of controlled substances?
- Are there more than one practitioner dispensing controlled substances from the registered location?
- Do you order for just yourself or for the whole clinic?
- What controlled substances are you currently dispensing? (If only one or two controlled substances are being ordered, have the practitioner fully explain why he administers or dispenses only these specific controlled substances).
- In what dosage levels is the practitioner dispensing (2 tablets, 4 times a day, for 30 days, or 90, 120, 240 a week, month).
- Does the practitioner prescribe as well as dispense to his patients?
- Does the practitioner prescribe the same controlled substances as were dispensed to the patient?
- How many patients is the practitioner presently treating (day, week, and month)?

Should you have any additional questions, concerns, or issues beyond what has been presented; it is strongly recommended you contact your local DEA Office.

# Contact Information

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September 12, 2012

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## **NEW DATA REVEAL 400% INCREASE IN SUBSTANCE ABUSE TREATMENT ADMISSIONS FOR PEOPLE ABUSING PRESCRIPTION DRUGS**

### ***White House Bulletin***

WASHINGTON - Today, Gil Kerlikowske, Director of National Drug Control Policy (ONDCP), and Thomas McLellan, Deputy Director of ONDCP, joined Peter Delany, Director of Substance Abuse and Mental Health Services Administration's (SAMHSA) Office of Applied Studies, and Michele M. Leonhart, Acting Administrator of the Drug Enforcement Administration (DEA), to release a new study showing a 400 percent increase in substance abuse treatment admissions for prescription pain relievers. Governor Jack Markell of Delaware and Chris Kennedy Lawford were also in attendance.

The study, Substance Abuse Treatment Admissions Involving Abuse of Pain Relievers 1998-2008, conducted by the SAMHSA, and based on the agency's Treatment Episode Data Set (TEDS) reveals a 400 percent increase between 1998 and 2008 of substance abuse treatment admissions for those aged 12 and over reporting abuse of prescription pain relievers. The increase in the percentage of admissions abusing pain relievers spans every age, gender, race, ethnicity, education, employment level, and region. The study also shows a more than tripling of pain reliever abuse among patients who needed treatment for opioid dependence.

"The TEDS data released today highlights how serious a threat to public health we face from the abuse of prescription drugs", said Gil Kerlikowske, National Drug Policy Director. "The spikes in prescription drug abuse rates captured by this study are dramatic, pervasive, and deeply disturbing."

"The non-medical use of prescription pain relievers is now the second-most prevalent form of illicit drug use in the Nation, and its tragic consequences are seen in substance abuse treatment centers and hospital emergency departments throughout our Nation" said SAMHSA Administrator Pamela S. Hyde, J.D. "This public health threat demands that we follow the President's National Drug Control Strategy's call for an all-out effort to raise awareness of this risk and the critical importance of properly using, storing, and disposing of these powerful drugs."

"The data released today is alarming and shows the tremendous damage being caused by prescription drug abuse all across this country each and every day," said DEA Acting Administrator Michele M. Leonhart. "The effective enforcement of laws regulating the distribution of controlled substances, coupled with their lawful disposal are essential parts of a comprehensive strategy to reduce drug abuse. DEA is committed to being part of the solution, however it will take all of us working together to prevent the tragedies that inevitably come with drug abuse."

"This rise in prescription drug abuse is no surprise to the doctors and law enforcement professionals who see its effects in our communities," said Governor Markell. "We have been focused on making sure that health care professionals have the best tools

available to detect and prevent this kind of abuse before it ruins lives. Delaware's new legislation to authorize a prescription monitoring program is one of those tools and an important component of the President's National Drug Control Strategy."

"Our national prescription drug abuse problem cannot be ignored. I have worked in the treatment field for the last 35 years, and recent trends regarding the extent of prescription drug abuse are startling," said A. Thomas McLellan, Deputy Director of ONDCP. "We must work with prescribers, the pharmaceutical industry, law enforcement, and families to help us fight this scourge."

The National Drug Control Strategy, released in May, outlines several steps to address what Director Kerlikowske calls "the fastest-growing drug problem in the United States"-prescription drug abuse.

They include

- \* Increasing prescription drug return, take-back, and disposal programs. Prescription drugs that are commonly abused are often found in the family medicine cabinet, and individuals should get rid of unused or expired prescription drugs to prevent diversion and abuse.
- \* Educating physicians about opiate painkiller prescribing. The Administration's FY 2011 Budget request proposes funding for a program to train prescribers on how to instruct patients in the use and proper disposal of painkillers, to observe signs of dependence, and to use prescription drug monitoring programs to detect when an individual is going from doctor to doctor in search of prescriptions (also called "doctor shopping").
- \* Expanding prescription drug monitoring programs. Currently, these programs are operating in 34 states. The Administration supports establishment of these programs in every state, and is seeking to ensure new and existing monitoring programs effectively use the data they acquire and share information across state lines.
- \* Assisting states in addressing doctor shopping and pill mills. Criminal organizations have established thriving businesses of transporting people to states with little regulation to obtain prescription drugs from multiple doctors or from pill mills, which distribute drugs indiscriminately. Federal, state, local, and tribal authorities are working together to address this problem.
- \* Driving illegal Internet pharmacies out of business.
- \* Cracking down on rogue pain clinics that do not follow appropriate prescription practices.

The National Drug Control Strategy provides a blueprint for reducing prescription drug abuse. Parents, law enforcement, the medical community, and all levels of government have a role to play in reducing prescription drug abuse.

Later today, Director Kerlikowske will travel to Delaware to attend Governor Markell's bill signing for the Delaware Prescription Drug Monitoring Program.

# U.S. can stop some drug sales at 2 CVS stores: judge

Tue, Mar 13 2012

WASHINGTON (Reuters) - The U.S. Drug Enforcement Administration can stop two CVS Caremark Corp pharmacies from selling potentially addictive drugs in a case involving suspected prescription drug abuse, a federal judge ruled on Tuesday.

U.S. District Judge Reggie Walton vacated a temporary restraining order that had blocked the Drug Enforcement Administration (DEA) from acting against the two Florida stores suspected of selling doses of the painkiller oxycodone outside legitimate channels.

Walton stayed his ruling until 10 a.m. (1500 GMT) on Wednesday to give CVS Caremark attorneys time to appeal. But the company appealed later on Tuesday. Further details were not immediately available.

CVS Caremark had asked the judge to impose a preliminary injunction that could have blocked the DEA from taking action until an administrative law judge decided the matter later this year.

Walton said he could find no reason to believe the CVS argument that DEA had acted in an "arbitrary and capricious" manner in ordering sales suspended or that remedial steps taken by CVS were sufficient.

"We are disappointed with today's ruling," CVS said in a statement. "Regardless of today's outcome, we remain committed to working with the DEA to do everything we can to reduce prescription drug abuse."

The litigation stems from the DEA's battle against prescription drug abuse, which has surged in the United States to eclipse abuse of most illicit drugs including heroin and cocaine.

The DEA said in court documents that about 7 million Americans abuse pharmaceuticals made with controlled substances for purposes not related to medicine and that Florida is the center of the growing epidemic.

The federal agency cited state statistics showing a 346 percent increase in overdose deaths related to oxycodone from 2005 to 2010, and an average 11 deaths per day from oxycodone, methadone, hydrocodone, benzodiazepines or morphine.

In a case related to the CVS ruling, Walton last month allowed the DEA to suspend Cardinal Health Inc's license to distribute controlled substances from a Florida facility that serves about 2,700 drug stores or hospitals.

The ruling was later blocked temporarily by a U.S. appeals court. Walton said he expected the appeals court to take the same action on CVS.

The CVS stores are two of four Cardinal customers that DEA has said were inappropriately filling oxycodone prescriptions.

A CVS attorney said the company had stopped oxycodone sales at the two pharmacies. But a Justice Department attorney said suspicious sales had involved other controlled substances.

The DEA charged that between January 2008 and December 2011 the two CVS stores purchased amounts of oxycodone far in excess of normal pharmacy volumes, ignored DEA warnings and addressed the issue only after the DEA acted.

A CVS attorney told the court that the volumes were not out of line for high-volume pharmacies that maintain 24-hour service and argued that remedial steps taken by CVS had eliminated any immediate danger to the community by the time the DEA ordered sales suspended in February.

The case is *Holiday CVS LLC v. Justice Department*, No. 12-00191.

(Reporting By David Morgan; Editing by Gary Hill)

**DEA: Oxycodone orders by pharmacies 20 times average**  
**USA Today.com**

Two Florida CVS pharmacies ordered more than 3 million oxycodone pills in 2011, more than 20 times higher than the national average, DEA agents said Monday.

As part of a crackdown on rampant painkiller abuse in Florida, the Drug Enforcement Administration charged a major health care company and the two CVS pharmacies in Sanford, Fla., with violating their licenses to sell the powerful pain pills and other drugs.

"It's a tremendous amount, way beyond what would be for legitimate use," said Mark Trouville, DEA special agent in charge of the Miami Field Division. "We're not talking about a gray area here."

The average pharmacy in the United States ordered about 69,000 oxycodone pills in 2011, the DEA said. The two CVS pharmacies, located less than 6 miles apart, ordered 3 million.

It is the first time the DEA has suspended the license of a chain pharmacy in Florida for its alleged role in the state's prescription drug abuse problem, Trouville said. The DEA had previously targeted pain clinics known as "pill mills" where rogue doctors prescribe thousands of pain pills with only cursory examinations.

"This is absolutely not the end of this investigation," Trouville said. "We knew when we hit the pill mills that pharmacies would be the next issue. We just didn't know chain pharmacies would get into it."

CVS said it took steps with DEA's knowledge to stop filling prescriptions from doctors thought to be prescribing improperly.

"We informed a small number of Florida physicians that CVS/pharmacy will no longer fill the prescriptions they write for Schedule II narcotics," spokeswoman Carolyn Castel said in a written statement. "Distributions of oxycodone to the two Florida stores have decreased by approximately 80% in the last three months compared to the prior three months — we believe in large part due to our action."

On Friday, the DEA on suspended Cardinal Health's controlled substances license at its Lakeland, Fla., distribution center after linking it to high-volume orders of pain pills to four Florida pharmacies, including the two in Sanford. The distribution center services 2,500 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily halted the suspension after Cardinal said it would stop supplying the drugs to the four pharmacies. A hearing on the suspension order was set for Feb. 13 in Washington, D.C.



Cardinal CEO George Barrett called the DEA action a "drastic overreaction" and said the company has "extensive processes" to prevent diversion of its pharmaceuticals for illegitimate use. Cardinal's internal controls have flagged more than 160 pharmacies in Florida and 350 pharmacies nationwide for "suspicious order patterns," he said.

"The needs of pharmacies are varied, and higher volumes can be appropriate based on a number of factors, including pharmacy size, hours of operation, patient demographics, and proximity to hospital and surgery centers, nursing homes, cancer clinics and hospice providers," Cardinal said in a statement.

**DEA moves against two Florida pharmacies, distributor over pill sales**  
**CNN.com**

(CNN) -- Agents from the Drug Enforcement Administration raided two CVS pharmacies in central Florida over the weekend, removing controlled substances and suspending the stores' ability to handle or distribute drugs such as painkillers oxycodone and hydrocodone.

The DEA said that during one year, the two pharmacies -- both in Sanford, Florida -- ordered more than 3 million oxycodone units from a pharmaceutical wholesaler, while a typical pharmacy orders 69,000.

"Each registrant (pharmacy) was filling prescriptions far in excess of legitimate needs of its customers," said DEA Special Agent in Charge Mark Trouville during a press conference Monday in central Florida.

The DEA also has suspended the controlled-substance license of the wholesale distributor, Cardinal Health of Lakeland, Florida, according to Trouville.

"Cardinal Health did not fulfill its due diligence to insure controlled substances were not diverted into other than legitimate channels," Trouville said.

On Friday, Cardinal Health filed and received an emergency injunction from a federal judge in Washington allowing the drug supplier to continue filling orders for other pharmacies.

"We believe the DEA is wrong," said Cardinal Health Chairman and CEO George Barrett in a written statement.

"We strongly disagree with the allegations the DEA has made against our facility and intend to vigorously challenge this action," said Barrett.

The two Sanford pharmacies remain open filling regular prescriptions but they cannot fill prescriptions for controlled substances such as oxycodone, one form of which is the well-known narcotic OxyContin.

CVS said in a written statement that the company is disappointed by the DEA actions but is fully cooperating with the DEA suspension.

"CVS/pharmacy is unwavering in its compliance with and support of the measures taken by federal and state law enforcement officials to prevent drug abuse and keep controlled substances out of the wrong hands," said CVS spokesman Mike DeAngelis.

Hearings on the suspensions will be held but no date has been set.

Trouville said that since the state of Florida moved to crack down on "pill mills" by banning doctors from directly distributing controlled narcotics, pharmacy sales of controlled substances have skyrocketed.

# DEA agents raid CVS pharmacies

BY ARELIS R. HERNÁNDEZ  
Staff Writer

Federal drug authorities raided two CVS stores in Seminole County on Saturday, removing boxes of medication and other materials from the pharmacies.

CVS spokesman Michael DeAngelis said the raid was related to action a day earlier by the Drug Enforcement Agency against Cardinal Health, which has a drug-distribution center in Lakeland.

The DEA tried to suspend the license of Cardinal Health in order to stop the company from shipping drugs such as oxycodone and hydrocodone from the Lakeland center. But a judge blocked DEA's order.

In a statement released Friday, Cardinal, a billion-dollar pharmaceutical company, said it distributes drugs to more than 2,500 pharmacies in the Southeast, including four pharmacies listed in the DEA's order, that are accused of filling prescriptions for purposes other than for legitimate medical reasons.

Agents on Saturday first raided the CVS pharmacy at 3798 Orlando Drive in Sanford, and then removed boxes from another CVS pharmacy at 5198 W. First St. in Sanford.

About a dozen DEA agents worked for hours at each location packaging items from behind the pharmacy counter while CVS employees went about their business helping customers fill prescriptions.

"We are disappointed that the DEA has taken administrative action to prohibit two CVS/pharmacy stores in Florida from dispensing controlled substances," DeAngelis said in a statement Saturday.

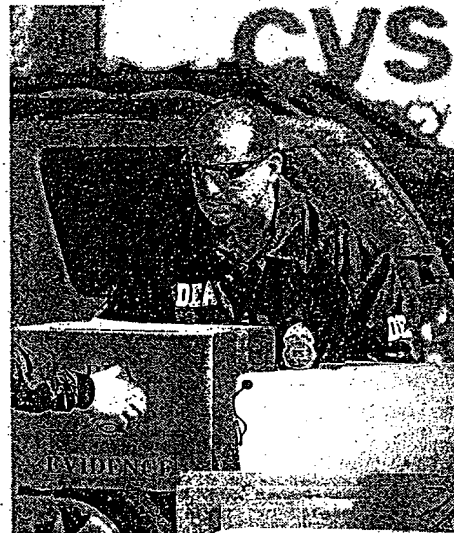
The raids come amid aggressive action by the DEA against businesses accused of dispensing suspicious prescriptions for powerful pain killers and anti-anxiety drugs.

Cardinal Health said it has cooperated with the agency and has stopped shipping to more than 160 Florida pharmacies in the past four years.

"We believe the DEA is wrong," Cardinal chairman and CEO George Barrett said in a statement. He added that the company has "extensive processes to help prevent those medicines from falling in the wrong hands."

CVS also defended its record, describing its compliance with state and federal law enforcement as "unwavering" in order "to prevent drug abuse and keep controlled substances out of the wrong hands."

More than two months ago, the com-



STEPHEN M. DOWELL/STAFF PHOTOGRAPHER

DEA special agent David Melenkevitz removes boxes of prescription painkillers from a Sanford CVS store Saturday.

pany sent a letter to a small group of Florida doctors telling them that they would no longer fill the prescriptions they write for painkillers and other addictive drugs.

"While we regret any inconvenience this may cause for our customers, we treat the dispensing of controlled substances with the utmost care and seriousness," CVS said in an email statement to the Orlando Sentinel last month.

At least one doctor on the list filed a defamation suit against CVS, saying the list falsely implied that the physician was acting unethically or illegally.

The pill-mill epidemic in Florida has prompted new laws and beefed-up law enforcement, which officials said last week is having a positive impact.

For example, sales of the painkiller oxycodone dropped 20 percent last year in Florida, the Drug Enforcement Administration said. And the number of powerful narcotic pills sold by Florida pharmacies and doctors dropped from 622 million in 2010 to 498 million last year.

CVS emphasized its role in that effort, saying oxycodone distribution at the two stores raided Saturday have "decreased by approximately 80 percent in the last three months compared to the prior three months — we believe in large part due to our action."

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# DEA charges 2 Fla. pharmacies in pill mill probe

## Drug wholesaler also under investigation

By Donna Leinwand Leger  
USA TODAY

Federal authorities have expanded their crackdown on painkiller abuse, charging a major health care company and two CVS pharmacies in Florida with violating their licenses to sell powerful pain pills and other drugs.

The Drug Enforcement Administration linked Cardinal Health to unusually high shipments of the controlled drugs to four pharmacies.

On Friday, the DEA suspended Cardinal's controlled substances license at its Lakeland, Fla., distribution center, which services 2,500 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily halted the suspen-

sion the same day after Cardinal, a \$1.3 billion company, said it would stop supplying the drugs to the four pharmacies. A hearing on the suspension order was set for Feb. 13 in Washington, D.C.

"We believe the DEA is wrong," CEO George Barrett said on the company's website.

The action comes as the DEA is cracking down on pill mills — rogue doctors and shady pharmacies that divert the highly addictive pills, such as oxycodone, to drug dealers.

"This is still an ongoing investigation," said DEA Special Agent David Meinenkevitiz, spokesman for the Miami Field Division. "We will be able to provide more information on Monday."

On Saturday, the DEA raided two CVS pharmacies in Sanford, Fla., and suspended their licenses to dispense controlled substances.

CVS said Saturday that it had taken steps with DEA's knowledge to stop filling prescriptions from doctors thought to be prescribing improperly.

"We informed a small number of Florida physi-

cians that CVS/pharmacy will no longer fill the prescriptions they write for Schedule II narcotics," spokeswoman Carolyn Castel said in a written statement. "Distributions of oxycodone to the two Florida stores have decreased by approximately 80% in the last three months compared to the prior three months — we believe in large part due to our action."

In its suspension order, the DEA alleges that Cardinal knew or should have known that the four retail pharmacies had purchased far more drugs than it needed to fulfill legitimate prescriptions.

The company called the DEA action a "drastic overreaction" that would disrupt delivery of critical medications to hospitals and pharmacies.

Cardinal has "extensive processes" to prevent diversion of its pharmaceuticals for illegitimate use, Barrett said. Cardinal's internal controls have flagged more than 160 pharmacies in Florida and 350 pharmacies nationwide for "suspicious order patterns," he said. Barrett said the DEA is holding

the company responsible for a part of the supply chain it does not control.

"At the time we filled these orders, the pharmacies held valid state board of pharmacy and DEA licenses," Barrett said in a call to investors Friday. "Pharmaceutical distributors do not influence the manufacture of controlled medicines. We do not write prescriptions. We do not dispense controlled medicines, nor do we license pharmacies. Our role is as a distributor, a critical link in the supply chain between pharmaceutical manufacturers and pharmacies."

Friday's action is the third time in five years the DEA has suspended Cardinal's controlled substances license. In November 2007, the DEA suspended the license for Cardinal's Auburn, Wash., distribution facility for selling 18 million hydrocodone pills in nine months to retail drugstores. The company sold 605,000 pills to one store in Burlington, Wash., over a seven-month period, the DEA said.

## Cardinal Health settles drug distribution case

*USA Today*

*May 16, 2012*

The DEA suspended Cardinal Health, the country's second largest drug distributor, from selling and shipping powerful painkillers and other drugs from its Lakeland, Fla., facility for two years as part of a settlement reached Tuesday.

The Drug Enforcement Administration sought to revoke Cardinal's license in February, accusing the company of selling excessive amounts - more than 12 million oxycodone pain pills - to four Florida pharmacies over three years. The DEA said the company did not report suspicious orders or visit the chain pharmacies that purchased large amounts of the drugs.

The DEA also suspended controlled substances licenses for two CVS pharmacies in Sanford, Fla., which purchased millions of oxycodone pills from Cardinal. A judge is expected to rule on the CVS case this month.

"Cardinal Health is not above the law," said Joe Rannazzisi, DEA deputy assistant administrator. "With this agreement, it admits that it neglected its vital responsibility to prevent the diversion of controlled substance medications."

While the agreement resolves the licensing issue, the DEA said it may pursue civil penalties, including fines, against the company. The Dublin, Ohio-based company had revenue of more than \$100 billion in 2011.

This is the second time the DEA has taken action against Cardinal. In 2008, Cardinal paid a \$34 million fine after the DEA accused it of shipping excessive amounts of hydrocodone, another powerful painkiller, to Internet pharmacies. As part of that settlement, the DEA suspended licenses at three distribution facilities for a year.

Cardinal admitted Tuesday it had "inadequate" control over some of its controlled drugs and had not fully complied with the 2008 agreement.

"This agreement allows us to put this matter behind us, and just as important, will clear the way for a more productive dialogue about how we and others in the health care and regulatory community can work together to prevent the abuse and misuse of prescription drugs," Cardinal CEO George Barrett said.

The five-year agreement applies to all 28 of Cardinal's distribution facilities and requires the company to review orders for the controlled drugs, visit pharmacies to look for signs of diversion and hire extra field inspectors for Florida pharmacies.

The Lakeland facility can still distribute non-controlled drugs and medical supplies.

## Cardinal Plant Can't Ship Pain Pills

### *Wall Street Journal*

A U.S. appeals court ruled Friday that a Cardinal Health Inc. distribution hub in Florida can't ship prescription painkillers while the company battles a Drug Enforcement Administration move to suspend that facility's license.

While the appeals court recently issued a stay of the DEA's enforcement efforts against Cardinal's Lakeland, Fla., facility, the court Friday said Cardinal hasn't met the "stringent requirements for an injunction." The decision means the Lakeland facility can't ship controlled substances until the appeal is sorted out.

Cardinal, based in Dublin, Ohio, said it activated contingency plans earlier this month "and will continue to endeavor to meet our customers' needs with minimal disruption from our other distribution centers."

The contingency plans involve shipping controlled drugs to customers in the Southeast U.S. from alternative facilities in Mississippi or North Carolina. Analysts have said the plans could add transportation costs to Cardinal and delay deliveries.

The suspension of the DEA license means the Lakeland facility is blocked from shipping controlled medications like the pain drug oxycodone to thousands of pharmacies, hospitals and other health-care providers. Cardinal, the nation's No. 2 drug distributor by sales after McKesson Corp., can still ship noncontrolled medications, which include most prescription drugs, and supplies such as surgical packs.

The DEA also suspended last month the controlled-medication licenses of four Florida pharmacies, including two owned and operated by CVS Caremark Corp. CVS won a temporary, administrative stay on Wednesday to keep dispensing controlled medications after an appeals court denied the pharmacy chain's request for a preliminary injunction.

The DEA took action against the Lakeland facility last month while accusing Cardinal of not doing enough to stop oxycodone abuse. Cardinal has said that it supports the DEA's efforts but also disagreed that it wasn't doing enough.

A U.S. District Court Judge ruled in late February that the government acted properly in trying to cut off shipments of oxycodone from the Lakeland site. Cardinal appealed that ruling in the U.S. Court of Appeals for the District of Columbia Circuit.

## DEA searches Fla. Walgreens in painkiller probe

CURT ANDERSON, AP Legal Affairs Writer  
Updated 3:01 p.m., Friday, April 6, 2012

MIAMI (AP) — Federal drug agents have searched six Walgreens pharmacies and a company distribution center in Florida as part of an investigation into prescription painkiller drug abuse, U.S. Drug Enforcement Administration officials said Friday.

The distribution center in Jupiter and the six pharmacies — two in Fort Pierce and one each in Hudson, Port Richey, Fort Myers and Oviedo — all showed signs of suspiciously high distribution of the highly addictive drug oxycodone, a DEA investigator wrote in an affidavit for the search warrants.

Such large amounts, investigator Marjorie Milan wrote, indicates "a pharmacy that fills prescriptions issued by physicians at pain clinics and/or a pharmacy which services primarily drug-seeking individuals who abuse the medication."

The searches for pharmacy records conducted Wednesday are the latest in a crackdown by federal and state authorities on "pill mills" and other illegal sources of prescription drugs in Florida, which has become the nation's leading source of oxycodone and similar drugs. The DEA says that prescription drug abuse now exceeds abuse of all illegal drugs combined, except marijuana.

Michael Polzin, a spokesman for Deerfield, Ill.-based Walgreens, said it is cooperating in the investigation.

8/14/2012

Earlier this year, the DEA moved to suspend the sale of similar controlled substances at two CVS pharmacies in the Orlando area, and the shipment of them from Cardinal Health Inc.'s Lakeland, Fla.-based center that supplied the stores. A federal appeals court recently upheld those suspensions.

DEA records cited in the Walgreens affidavit show sharp increases in oxycodone purchases at each of the locations. For example, the pharmacy in Fort Myers went from selling 95,800 units of oxycodone in 2009 to more than 2.1 million units in 2011 — good for 67 percent of all the oxycodone purchased by pharmacies in that same zip code in 2011.

In the first two months of this year, the DEA added, 53 Walgreens pharmacies are listed in the agency's top 100 purchasers of oxycodone. In 2009, none were on the list.

Earlier this year, the DEA released figures showing that Florida may be losing its distinction as the nation's leading illicit source for painkillers because of the ongoing law enforcement crackdown and several new laws. Florida also last year began operating a prescription drug tracking system and database aimed at combating illegal diversion of the drugs.

About 85 people, including at least 13 doctors, have been arrested in South Florida over the past year on pill mill-related charges, according to federal prosecutors.

8/14/2012



## The DEA's prescription drug policy saves many lives

Wall Street Journal

By: Peter Bensinger and Robert L. DuPont

Scott Gottlieb's "The DEA's War on Pharmacies—and Pain Patients" (op-ed, March 23) hardly tells the true story of prescription drug abuse and the government's response. In the current Cardinal Health case, the Drug Enforcement Administration discovered numerous oxycodone transactions that greatly exceeded the "suspicious order" criteria in the law and were not halted or reported to the DEA. Cardinal Health was fined \$34 million in 2008 for similar violations.

Last July, the Florida legislature declared a public-health emergency—not because of a shortage of medicine, but because of increased overdose deaths caused by prescription opioids. Last year 25 distributors provided over 570 million dosage units of oxycodone in Florida alone, with Cardinal Health accounting for 25%.

Dr. Gottlieb thinks transferring DEA's responsibilities to the FDA would be a good idea, yet the FDA's record when it comes to regulating controlled substances is not good. In 1996, DEA asked FDA to schedule Soma (carisoprodol), a muscle relaxant abused by opiate addicts. In 2009, 13 years later, the FDA granted permission to schedule the drug. In 2004, the DEA asked the FDA to reschedule hydrocodone products (Vicodin, Lortab, etc.). The FDA responded four years later but did not agree to tighten the controls on what continues to be America's most frequently prescribed opioid associated with significant overdose deaths. A bill currently in Congress, if passed, will accomplish this long overdue action.

Prescription-drug overdose deaths now exceed U.S. motor-vehicle fatalities. The only federal agency that has confronted the unlawful diversion of these drugs is the DEA. Shifting regulatory control from the DEA to the FDA would accomplish nothing, but would add to the problem.

The DEA represents the unspoken interests of tens of thousands of victims harmed or killed each year by prescription drug abuse. The DEA's enforcement actions in Florida are clearly in the public interest, and its regulatory authority should not be diminished, but strongly supported.

**Top 50 Pharmacies  
Sales of Oxycodone 15mg (NDC 52152-0214-02)  
2010**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	245,000
2	AB9244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	213,600
3	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	194,600
4	BH8636598	HEPZIBAH	HILLSBOROUGH	TAMPA	FL	33613	177,300
5	BE6812754	EXPRESS SCRIPTS	BUCKS	BENSALEM	PA	19020	158,300
6	BT7485166	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIOCH	TN	37013	150,000
7	BJ3675456	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	148,000
8	FJ1305689	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	145,900
9	BS8246349	SAFESCRIPT PHARMACY #6	CABELL	HUNTINGTON	WV	25701	145,400
10	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	138,000
11	FH1151517	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	136,100
12	BW5872494	WALGREEN CO.	SANT LUCIE	FORT PIERCE	FL	34981	127,900
13	FS0617893	SANDLAKE PHARMACY	ORANGE	ORLANDO	FL	32819	126,600
14	BE8131625	ESI MAIL PHARMACY SERVICE	MARICOPA	TEMPE	AZ	85284	125,500
15	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	125,500
16	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	124,100
17	BP6777532	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	117,400
18	BN9244726	NORWIN PHARMACY	WESTMORELAND	IRWIN	PA	15642	110,200
19	BO9931557	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	108,700
20	BH9875026	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	103,400
21	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	101,100
22	BW3133915	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	99,500
23	BW5039804	WALGREEN EASTERN CO., INC.	STRAFFORD	ROCHESTER	NH	03867	99,000
24	FW0277283	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	98,900
25	FP1067164	PERRY DRUG INC.	JOHNSON	LENEXA	KS	66215	97,600
26	BW8910879	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819	96,500
27	FU1700512	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605	94,700
28	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	94,500
29	BH9874810	HAPPY HARRY'S INC.	SUSSEX	LEWES	DE	19958	93,600
30	BW7920413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234	91,500
31	AW6020541	WALGREEN CO.	MANATEE	BRADENTON	FL	34205	90,600
32	AE6893374	ELK PHARMACY INC	SURRY	ELKIN	NC	28621	89,300
33	BL4229515	LOVELACE OUTPATIENT PHARMACY	BERNALILLO	ALBUQUERQUE	NM	87108	88,800
34	BH9874151	HAPPY HARRY'S INC.	NEW CASTLE	NEWARK	DE	19713	88,700

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Buyer's Total
35	AM8423080	MANOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	87,600
36	AW6020539	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	86,300
37	BH9875216	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19956	86,000
38	BE6824317	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	85,700
39	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	84,300
40	BP8246236	PHARMCORE INC	BROWARD	HALLANDALE	FL	33009	82,600
41	A97118246	TRU-VALU DRUGS	PALM BEACH	LAKE WORTH	FL	33460	82,500
42	FW0998647	WALGREEN CO	ORANGE	WINTER PARK	FL	32789	82,200
43	BW6561270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	82,000
44	BW9643013	WALGREEN CO.	ASHTABULA	ASHTABULA	OH	44004	81,700
45	AG0388238	P & S PHARMACY	SULLIVAN	KINGSPORT	TN	37660	81,600
46	FW1422512	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99654	81,400
47	BH9874923	HAPPY HARRY'S INC.	SUSSEX	MILLSBORO	DE	19966	81,200
48	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	80,400
49	BW7169154	WALGREEN CO.	SALT LAKE	SALT LAKE CITY	UT	84118	79,400
50	BW5431084	WAL-MART PHARMACY 10-1242	HENDERSON	HENDERSONVILLE	NC	28792	79,200

**Top 50 Pharmacies  
Sales of Oxycodone 30mg (NDC 52152-0215-02)  
2010**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	1,360,800
2	BJ3675456	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	1,079,100
3	BG5677630	GENERIC DEPOT #2 INC	BROWARD	HOLLYWOOD	FL	33026	970,400
4	FG1544229	GENERIC DEPOT 3, INC	BROWARD	FORT LAUDERDALE	FL	33321	792,400
5	FH0772257	HILLS PHARMACY	HILLSBOROUGH	TAMPA	FL	33615	653,400
6	BJ9752115	JR PHARMACY	ORANGE	ORLANDO	FL	32837	618,600
7	AW8830247	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	559,700
8	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	543,500
9	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	542,300
10	BW5872494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	517,700
11	BO9931557	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	492,000
12	BW3133915	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	470,600
13	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	447,200
14	BK7456052	KABS OF TAMPA	HILLSBOROUGH	TAMPA	FL	33613	405,400
15	BS9255274	SUPERIOR PHARMACY LLC	HILLSBOROUGH	TAMPA	FL	33609	379,300
16	BB6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	362,900
17	FN1282968	NDBP LLC	BROWARD	POMPANO BEACH	FL	33064	359,200
18	AW2058887	WALGREEN CO.	PINELLAS	LARGO	FL	33771	352,700
19	FK1428196	KISKEYA PHARMACY	BROWARD	FORT LAUDERDALE	FL	33312	349,200
20	BH9131436	HYGEIA HOLDINGS, LLC	PINELLAS	LARGO	FL	33771	335,700
21	BW7056547	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428	332,800
22	BP6777532	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	322,800
23	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	319,200
24	BS9699731	SUPERIOR PHARMACY, LLC	HILLSBOROUGH	TAMPA	FL	33615	318,100
25	BR0179730	RUPAL ENTERPRISE INC	SUFFOLK	SELDEN	NY	11784	315,600
26	FJ1672763	JPPD INC	PALM BEACH	BOCA RATON	FL	33431	314,300
27	AS8841428	SCHAEFER DRUGS WELLINGTON	PALM BEACH	WELLINGTON	FL	33414	313,900
28	FF0129709	FUTURE PHARMACY LLC	MIDDLESEX	OLD BRIDGE	NJ	08857	313,800
29	BL3161178	L KRENK	MAUI	KAHULUI	HI	96732	312,600
30	BB9044847	BETTER HEALTH PHARMACY INC	HILLSBOROUGH	SEFFNER	FL	33584	310,300
31	BS9491147	SUPER SAVER PHARMACY	OSCEOLA	KISSIMMEE	FL	34744	300,400
32	BW0882957	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	298,900
33	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	295,100

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
34	AW0200939	WALGREEN CO.	BROWARD	HOLLYWOOD	FL	33024	294,100
35	BW6561270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	291,000
36	FP1223899	PROGRESSIVE PHARMACY INC.	PALM BEACH	LAKE WORTH	FL	33467	287,400
37	AH2731025	HOLLYWOOD DISCOUNT PHARMACY	BROWARD	HOLLYWOOD	FL	33021	286,300
38	BW7288752	WALGREEN CO.	ORANGE	OCOE	FL	34761	282,400
39	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	277,700
40	BS9839424	SARASOTA PHARMACY SERVICES	SARASOTA	SARASOTA	FL	34233	277,300
41	FE1512501	EDGE PHARMACY	POLK	LAKELAND	FL	33803	272,900
42	AW3132963	WALGREEN CO.	ORANGE	ORLANDO	FL	32822	262,500
43	BC9698448	CHEMISTS N DRUGGISTS, INC.	PALM BEACH	BOYNTON BEACH	FL	33436	256,500
44	AT0205167	PRESCRIPTION SHOP OF STUART	MARTIN	STUART	FL	34994	254,400
45	AK3221140	KEANSBURG DRUGS	MONMOUTH	KEANSBURG	NJ	07734	251,500
46	FS0617893	SANDLAKE PHARMACY	ORANGE	ORLANDO	FL	32819	251,400
47	FA0523147	A.I.P. HEALTHCARE SERVICES	BROWARD	FORT LAUDERDALE	FL	33309	250,600
48	BW8940923	WALGREEN CO.	PINELLAS	LARGO	FL	33771	249,500
49	BP9741934	PHARMACY XPRESS OF FL, III	BROWARD	FORT LAUDERDALE	FL	33334	245,200
50	FG1524657	GENERIC RX, LLC	BROWARD	DEERFIELD BEACH	FL	33442	245,000

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1	AW136877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	411,100
2	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	148,000
3	BE6824317	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	131,800
4	BW8487438	WALGREEN CO.	SEMINOLE	OVIEDO	FL	32765	128,300
5	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	127,800
6	BT0167444	THE MEDICINE SHOPPE	ALLEGHENY	OAKMONT	PA	15139	122,000
7	FW0277283	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	121,400
8	BT937965	THE PILL BOX PHARMACY	SUSSEX	MILFORD	DE	19963	110,600
9	BW5872494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	109,800
10	BC7126457	CAREMED HEALTH CORPORATIO	LEE	BONITA SPRINGS	FL	34135	109,300
11	FH1151517	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	106,300
12	BN9244726	NORWIN PHARMACY	WESTMORELAND	IRWIN	PA	15642	106,200
13	FP1856446	PHARMA-1	FRANKLIN	COLUMBUS	OH	43207	105,600
14	AB9244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	105,600
15	FV2178879	VILLAGE PHARMACY	LIVINGSTON	DENHAM SPRINGS	LA	70726	101,200
16	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	99,000
17	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	98,900
18	BE9738026	ESTRELLA PHARMACY	MARICOPA	PHOENIX	AZ	85037	96,400
19	AT1701172	CITY PHARMACY INC OF ELKTON	CECIL	ELKTON	MD	21921	94,500
20	BW6561270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	93,200
21	AW8830247	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	92,200
22	AN1556337	NATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72901	86,700
23	FW1144574	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	86,300
24	BW5507415	WALGREEN CO.	SEMINOLE	OVIEDO	FL	32765	83,900
25	FU1700512	UPSTATE PHARMACY CROSS CR	GREENVILLE	GREENVILLE	SC	29605	83,800
26	FW1444695	WALGREEN CO.	ORANGE	ORLANDO	FL	32807	81,800
27	BS8246349	SAFESCRIPT PHARMACY #6	CABELL	HUNTINGTON	WV	25701	81,600
28	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	79,900
29	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	79,200
30	BH9875026	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	79,100
31	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	78,300
32	FJ1305689	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	77,600
33	FH0895815	HAPPY HARRY'S INC.	KENT	DOVER	DE	19904	77,500
34	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	76,500

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
35	AW6020539	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	76,500
36	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	74,400
37	BH9875216	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19956	74,300
38	FW0688272	WALGREEN CO.	CLARK	WINCHESTER	KY	40391	74,200
39	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	73,900
40	BW7758759	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709	73,600
41	AW6043234	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712	68,800
42	FW1422512	WALGREEN CO.	MATANUSKA SUSITN	WASILLA	AK	99654	68,600
43	BW3133915	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	68,500
44	AM8423080	MANOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	65,200
45	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	65,000
46	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947	64,700
47	AW1768463	WALGREEN CO.	MARTIN	STUART	FL	34997	64,700
48	AW2290699	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	64,300
49	BT7485166	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIOCH	TN	37013	63,900
50	AW6020541	WALGREEN CO.	MANATEE	BRADENTON	FL	34205	63,600

**Top 50 Pharmacies  
Sales of Oxycodone 30mg (NDC 00228-2879-11  
2011**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	851,200
2	BW8487438	WALGREEN CO.	SEMINOLE	OVEDO	FL	32765	817,400
3	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	718,800
4	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	618,500
5	BW5872494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	439,900
6	BW6561270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	429,500
7	FR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	BOGALUSA	LA	70427	418,200
8	BW1249160	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	404,800
9	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	356,800
10	AN1556337	NATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72901	334,700
11	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	308,400
12	AW1307138	WALGREEN CO.	CITRUS	HOMOSSASSA	FL	34446	295,300
13	BW9688992	WALGREEN CO.	MARION	OCALA	FL	34482	295,000
14	BW9628631	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33702	291,200
15	FD0598207	DUANE READE	NEW YORK	NEW YORK	NY	10003	289,800
16	BW1229118	WALGREEN CO.	DUVAL	JACKSONVILLE	FL	32216	285,300
17	BF9649508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919	259,300
18	FW0457122	WALGREEN CO.	CITRUS	HOMOSSASSA	FL	34446	247,100
19	AW1768463	WALGREEN CO.	MARTIN	STUART	FL	34997	244,900
20	BW8940923	WALGREEN CO.	PINELLAS	LARGO	FL	33771	228,400
21	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	225,500
22	BW0882957	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	217,400
23	AK3221140	KEANSBURG DRUGS	MONMOUTH	KEANSBURG	NJ	07734	214,700
24	BB6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	210,200
25	AW0201032	WALGREEN CO.	PALM BEACH	WEST PALM BEACH	FL	33404	209,800
26	BW7056547	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428	208,000
27	AW2388242	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34950	206,400
28	FW0064799	WALGREEN CO.	PALM BEACH	WELLINGTON	FL	33414	205,600
29	FH0825313	HUMANA PHARMACY INC DBA RIGHTSO	BUTLER	WEST CHESTER	OH	45069	204,600
30	AW2290699	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	202,700
31	BJ3675456	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	201,900
32	FW1444695	WALGREEN CO.	ORANGE	ORLANDO	FL	32807	197,600
33	AW6043234	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712	196,500



Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
34	BW4808929	WALGREEN CO.	INDIAN RIVER	VERO BEACH	FL	32962	196,500
35	BW5507415	WALGREEN CO.	SEMINOLE	OVIEDO	FL	32765	191,900
36	BW5108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816	191,700
37	BH4285309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614	190,700
38	BE9503687	E. HARTMAN LLC DBA DEAL DRUGS	DAVIDSON	NASHVILLE	TN	37211	188,800
39	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	185,000
40	AW6041153	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33703	180,700
41	BW7758759	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709	178,900
42	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	178,600
43	BW0523488	WALGREEN CO.	PASCO	NEW PORT RICHEY	FL	34653	177,400
44	BW4933114	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33707	177,400
45	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	174,400
46	BA3438505	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128	173,900
47	AW3050995	WALGREEN CO.	PINELLAS	LARGO	FL	33770	173,000
48	FM1807289	MAYNARDVILLE PHARMACY INC	UNION	MAYNARDVILLE	TN	37807	171,700
49	AH2731025	HOLLYWOOD DISCOUNT PHARMACY	BROWARD	HOLLYWOOD	FL	33021	171,600
50	FP1067164	PERRY DRUG INC.	JOHNSON	LENEXA	KS	66215	166,100

**Top 50 Pharmacies**  
**Sales of Oxycodone 15mg (NDC 00228-2878-11)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	132,200
2	AB9244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	127,600
3	FB2049446	BYPASS PHARMACY, INC	RALEIGH	BECKLEY	WV	25801	105,800
4	FH1151517	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	104,000
5	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	88,000
6	BT0167444	THE MEDICINE SHOPPE	ALLEGHENY	OAKMONT	PA	15139	84,000
7	FH1454999	HOWARD FAMILY PHARMACY, INC.	FLOYD	EASTERN	KY	41622	82,600
8	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	81,800
9	BF4478803	FRANCK'S EPS	ALLEGHENY	PITTSBURGH	PA	15202	81,600
10	FA2348616	ARIZONA PHARMACY # 2	MARICOPA	PHOENIX	AZ	85027	79,600
11	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	76,400
12	BW5093858	WALGREEN EASTERN CO., INC.	PROVIDENCE	WOONSOCKET	RI	02895	75,800
13	BC8361343	CRAIN TOWERS PHARMACY	ANNE ARUNDEL	GLEN BURNIE	MD	21061	75,800
14	BW4050996	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208	75,600
15	FW1144574	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	74,000
16	BW7920413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234	73,400
17	FU1700512	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605	72,800
18	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	72,000
19	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	70,200
20	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	70,200
21	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	69,600
22	BN7185386	NORTHSIDE PHARMACY LLC	LAFAYETTE	LAFAYETTE	LA	70501	69,600
23	FW1422512	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99654	67,000
24	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947	65,200

**Top 50 Pharmacies**  
**Sales of Oxycodone 15mg (NDC 00228-2878-11)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
25	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	64,400
26	BW8910879	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819	64,000
27	BT7485166	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIOCH	TN	37013	63,400
28	FJ1305689	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	63,000
29	BW6678734	WALGREEN CO.	BALTIMORE CITY	BALTIMORE	MD	21224	63,000
30	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	63,000
31	FM1704825	MEDARBOR PHARMACY	MONTGOMERY	BALA CYNWYD	PA	19004	62,400
32	BW7143908	WALGREEN CO.	HILLSBOROUGH	TAMPA	FL	33603	61,800
33	BX9625560	XPRESS CARE PHARMACY	MARICOPA	AVONDALE	AZ	85392	58,600
34	BL9260415	LAKE PHARMACY	LAKE	CLEARLAKE	CA	95422	58,200
35	BW9404358	WALGREEN EASTERN CO., INC.	BUCKS	LEVITTOWN	PA	19054	58,000
36	BW3057393	WALGREEN HASTINGS CO.	SANDOVAL	RIO RANCHO	NM	87124	58,000
37	FR2333780	RT 70 PHARMACY, INC	CAMDEN	CHERRY HILL	NJ	08034	56,400
38	BW6057790	WALGREEN CO.	PUEBLO	PUEBLO	CO	81005	56,200
39	BW5119498	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208	56,000
40	BS7479959	SUSITNA PROFESSIONAL PHARMACY	MATANUSKA SUSITNA	WASILLA	AK	99654	56,000
41	BW5108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816	54,600
42	BM8708692	MEDICAP PHARMACY	CRAVEN	NEW BERN	NC	28560	53,600
43	AW5120237	WALGREEN ARIZONA DRUG CO.	MARICOPA	PHOENIX	AZ	85051	53,400
44	BW3834555	WALGREEN CO.	MANITOWOC	MANITOWOC	WI	54220	53,200
45	FW0812532	WALGREEN CO	CHARLES	LA PLATA	MD	20646	52,600
46	BH9875040	HAPPY HARRY'S INC.	NEW CASTLE	WILMINGTON	DE	19806	52,600
47	BH9875026	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	52,600
48	FH0895815	HAPPY HARRY'S INC.	KENT	DOVER	DE	19904	52,000

**Top 50 Pharmacies**  
**Sales of Oxycodone 15mg (NDC 00228-2878-11)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
49	AW0201210	WALGREEN CO.	MANATEE	BRADENTON	FL	34205	52,000
50	AW6020541	WALGREEN CO.	MANATEE	BRADENTON	FL	34205	52,000

Top 50 Pharmacies									
Sales of Oxycodone 15mg (NDC 52152-0214-02)									
January 1, 2012 to June 30, 2012									
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total		
1	FQ1872844	QUICK CARE PHARMACY INC	SAN BERNARDINO	RANCHO CUCAMON	CA	91730	3,600		
2	AA8612790	CIGNA HEALTH PLAN OF ARIZONA	MARICOPA	SUN CITY	AZ	85351	2,400		
3	BF3545704	FRUTH PHARMACY #16	PIKE	WAVERLY	OH	45690	2,400		
4	FD0982846	DELCO DRUGS & SPECIALTY PHARMACY IN	RICHMOND	STATEN ISLAND	NY	10312	1,000		
5	BB9732389	BASHAS UNITED DRUG #160	PIMA	TUCSON	AZ	85704	1,000		
6	BF1124609	FRUTH PHARMACY OF HURRICANE	PUTNAM	HURRICANE	WV	25526	900		
7	FM0386082	MORRILTON FOOD & DRUG BIG STAR	CONWAY	MORRILTON	AR	72110	600		
8	FT0748333	TOTAL PHARMACY AND COMPOUNDING S	HARRIS	HOUSTON	TX	77006	500		
9	AK5643095	KLINGENSMITH'S DRUG STORE	ARMSTRONG	FORD CITY	PA	16226	500		
10	BR3876084	REEDSBURG MEDIC ARTS PHAR	SAUK	REEDSBURG	WI	53959	300		
11	AW4125452	BUFFALO DRUGS INC	BERRIEN	NEW BUFFALO	MI	49117	200		
12	BE8487589	EDMONDSON DRUG CO INC	CULLMAN	HANCEVILLE	AL	35077	100		
13	FT0710649	TAINO STAR PHARMACY INC	NEW YORK	NEW YORK	NY	10035	100		

**Top 50 Pharmacies  
Sales of Oxycodone 30mg (NDC 52152-0215-02)  
January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BO9283184	OLD TOWN PHARMACY INC	RICHMOND	STATEN ISLAND	NY	10305	26000
2	BM4633269	MW & W GLOBAL ENTERPRISES INC	KINGS	BROOKLYN	NY	11222	17600
3	BB4896784	BARRINGTON-WILSHIRE PHARMACY	LOS ANGELES	LOS ANGELES	CA	90025	12000
4	FS2338918	SAV MART PHARMACY II	WAYNE	DETROIT	MI	48207	9700
5	AR5920079	ROSSMORE PHARMACY INC	ESSEX	BELLEVILLE	NJ	07109	8300
6	BS9114000	SAIN MARY AND JESSIE, LLC	MIDDLESEX	PERTH AMBOY	NJ	08861	7900
7	AP5437199	PARAMOUNT DRUG	BURLINGTON	RIVERSIDE	NJ	08075	7200
8	BM9698551	MEDMART PHARMACY	FAYETTE	CONNELLSVILLE	PA	15425	7200
9	BG4568715	BRIDGE & PRATT FAMILY PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19124	6100
10	AM9597800	MOUNDSVILLE PHARMACY	MARSHALL	MOUNDSVILLE	WV	26041	5600
11	FS1638266	SCRIPT LIFE PHARMACY	FRESNO	CLOVIS	CA	93612	5400
12	BD0100317	DEAL ENTERPRISE	VENTURA	SIMI VALLEY	CA	93065	4800
13	BM0180086	MEDICINE SHOPPE	FRESNO	FRESNO	CA	93727	4500
14	BR6655712	RIVERSIDE PHARMACY	ETOWAH	GADSDEN	AL	35901	4100
15	BS9442966	SUPER RX PHARMACY #151	SAN DIEGO	OCEANSIDE	CA	92054	3600
16	FF1382542	FAMILY PHARMACY	NYE	PAHRUMP	NV	89048	3000
17	BF4837071	FOLLANSBEE PHARMACY	BROOKE	FOLLANSBEE	WV	26037	3000
18	BQ0878629	QUICK CHEK PHARMACY DEPT	OCEAN	BEACHWOOD	NJ	08722	3000
19	BS9128516	SULLIVAN PHARMACY INC	SULLIVAN	LIBERTY	NY	12754	2400
20	FH1614519	HARPER WOODS PHARMACY LLC	WAYNE	HARPER WOODS	MI	48225	2400
21	BF3545704	FRUTH PHARMACY #16	PIKE	WAVERLY	OH	45690	2400
22	FQ1872844	QUICK CARE PHARMACY INC	SAN BERNARDINO	RANCHO CUCAMONG	CA	91730	2400
23	AP1653117	P & G PHARMACY INC	NASSAU	FARMINGDALE	NY	11735	2000
24	FM2413780	MAST PHARMACY & SURGICAL	BURLINGTON	BORDENTOWN	NJ	08505	2000

**Top 50 Pharmacies**  
**Sales of Oxycodone 30mg (NDC 52152-0215-02)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
25	AQ2494297	QUICK CHEK PHCY DEPT	HUDSON	BAYONNE	NJ	07002	2000
26	BM1457642	MISSION PHARMACY	LOS ANGELES	LONG BEACH	CA	90813	2000
27	AM2905935	M B DRUGS INC	KINGS	BROOKLYN	NY	11215	1800
28	BF7447774	FARMACIA SAN ANTONIO	CAMDEN	CAMDEN	NJ	08105	1800
29	FC0792704	CHURCH SQUARE PHARMACY	CUYAHOGA	CLEVELAND	OH	44103	1700
30	BB9732389	BASHAS UNITED DRUG #160	PIMA	TUCSON	AZ	85704	1600
31	FA2650807	AGHAPY PHARMACY INC	RIVERSIDE	SAN JACINTO	CA	92583	1500
32	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	HARRIS	HOUSTON	TX	77006	1500
33	FS2058611	SANKOFA PHARMACY INC	PHILADELPHIA	PHILADELPHIA	PA	19111	1500
34	FM0386082	MORRILTON FOOD & DRUG BIG STAR	CONWAY	MORRILTON	AR	72110	1400
35	BA4725315	AMAN PHARMACY	SUFFOLK	SHOREHAM	NY	11786	1200
36	FC2126957	CAMPUS PHARMACY	ESSEX	NEWARK	NJ	07103	1200
37	BO8436669	OKIES PHARMACY	GRAINGER	BLAINE	TN	37709	1200
38	FC1748788	CLARK LOWCOST PHARMACY	CUYAHOGA	CLEVELAND	OH	44109	1100
39	BR3653842	RIDGWAY PHARMACY	MONTGOMERY	DAYTON	OH	45403	1000
40	BW9060702	WILKES FAMILY PHARMACY	WILKES	WILKESBORO	NC	28697	1000
41	FG1277044	GAULEY RIVER PHARMACY	NICHOLAS	CRAIGSVILLE	WV	26205	1000
42	AI9065423	FRANWIN PHARMACY	NASSAU	MINEOLA	NY	11501	1000
43	BP6460632	PLATINUM CARE PHARMACY INC	WAYNE	DETROIT	MI	48206	1000
44	BF1124609	FRUTH PHARMACY OF HURRICANE	PUTNAM	HURRICANE	WV	25526	800
45	BF0323775	FRENCHTOWN PHARMACY	HUNTERDON	FRENCHTOWN	NJ	08825	800
46	AM0561010	MACLEOD PRESCRIPTION PHARMACY	NIAGARA	NIAGARA FALLS	NY	14304	800
47	BA3799511	CVS ALBANY, L.L.C.	NASSAU	HICKSVILLE	NY	11801	600
48	BG9929071	GETMAN-APOTHECARY SHOPPE	TULSA	TULSA	OK	74104	600

Top 50 Pharmacies

Sales of Oxycodone 30mg (NDC 52152-0215-02)

January 1, 2012 to June 30, 2012

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
49	AL2338754	HARROLD'S PHARMACY	LUZERNE	WILKES BARRE	PA	18702	600
50	FP0152277	PEOPLE PHARMACY LLC	WAYNE	DETROIT	MI	48235	600



**Top 50 Pharmacies**  
**Sales of Oxycodone 30mg (NDC 00228-2879-11)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	628,100
2	BA3438505	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128	409,200
3	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	279,200
4	FD0598207	DUANE READE	NEW YORK	NEW YORK	NY	10003	265,200
5	BF9649508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919	227,400
6	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	193,800
7	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	165,600
8	BW4963977	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89030	156,100
9	BW5108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816	154,600
10	BW6630380	WAL-MART PHARMACY 10-2627	HILLSBOROUGH	TAMPA	FL	33612	154,300
11	FR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	BOGALUSA	LA	70427	151,600
12	AK3221140	KEANSBURG DRUGS	MONMOUTH	KEANSBURG	NJ	07734	149,100
13	BW6917972	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89032	143,500
14	BH9875040	HAPPY HARRY'S INC.	NEW CASTLE	WILMINGTON	DE	19806	143,400
15	BB6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	138,700
16	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	137,700
17	FH1306984	HOPKINS PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19128	136,800
18	AW5732119	WALGREEN ARIZONA DRUG CO.	PIMA	TUCSON	AZ	85712	136,600
19	BW8421707	WALGREEN CO.	CLARK	LAS VEGAS	NV	89107	134,800
20	FH0825313	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	OH	45069	132,900
21	BH4285309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614	132,900
22	BW4986622	WALGREEN CO.	CLARK	LAS VEGAS	NV	89108	132,800
23	BW4319338	WALGREEN CO.	BLOUNT	ALCOA	TN	37701	132,300
24	BW5737791	WALGREEN CO.	CLARK	LAS VEGAS	NV	89121	131,000

**Top 50 Pharmacies**  
**Sales of Oxycodone 30mg (NDC 00228-2879-11)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
25	BW0882957	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	129,600
26	BS7719795	SHAYONA PHARMACY	MIDDLESEX	PERTH AMBOY	NJ	08861	128,600
27	BW6842656	WALGREEN EASTERN CO., INC.	SUFFOLK	SELDEN	NY	11784	120,100
28	BD1649978	DISNEY PHARMACY SERVICES	KNOX	POWELL	TN	37849	119,700
29	FW1672422	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10305	116,500
30	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	115,100
31	BW8855655	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10312	114,700
32	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	112,800
33	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	112,100
34	BT6419053	THE HOMETOWN PHARMACY	LAWRENCE	NEW CASTLE	PA	16101	111,000
35	BW7249623	WALGREEN CO.	CLARK	LAS VEGAS	NV	89106	110,800
36	BP9744524	PRESCRIPTION SOLUTIONS BY OPTUMRX	SAN DIEGO	CARLSBAD	CA	92010	110,800
37	BE9503687	E. HARTMAN LLC DBA DEAL DRUGS	DAVIDSON	NASHVILLE	TN	37211	110,600
38	AW1124306	WALGREEN CO.	DONA ANA	LAS CRUCES	NM	88001	110,400
39	FM1083500	MEDPOINT PHARMACY, INC.	MILWAUKEE	MILWAUKEE	WI	53209	109,400
40	BW4616299	WALGREEN EASTERN CO., INC.	UNION	ELIZABETH	NJ	07208	107,700
41	FB2049446	BYPASS PHARMACY, INC	RALEIGH	BECKLEY	WV	25801	107,500
42	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	104,700
43	BW7577490	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	104,600
44	FC0863274	CKC INVESTMENT INC	ORANGE	FULLERTON	CA	92835	103,100
45	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	102,800
46	FR2333780	RT 70 PHARMACY, INC	CAMDEN	CHERRY HILL	NJ	08034	102,600
47	BW5483970	WALGREEN CO.	CLARK	LAS VEGAS	NV	89104	102,600
48	FW1840289	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10305	102,200

**Top 50 Pharmacies**  
**Sales of Oxycodone 30mg (NDC 00228-2879-11)**  
**January 1, 2012 to June 30, 2012**

Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
49	AH2731025	HOLLYWOOD DISCOUNT PHARMACY	BROWARD	HOLLYWOOD	FL	33021	101,800
50	BW1229118	WALGREEN CO.	DUVAL	JACKSONVILLE	FL	32216	100,500

The following charts and graphs have been compiled from ARCOS reports your firm has previously submitted to DEA. The data was reviewed and the purchases of a few of your customers will be addressed during our discussion.

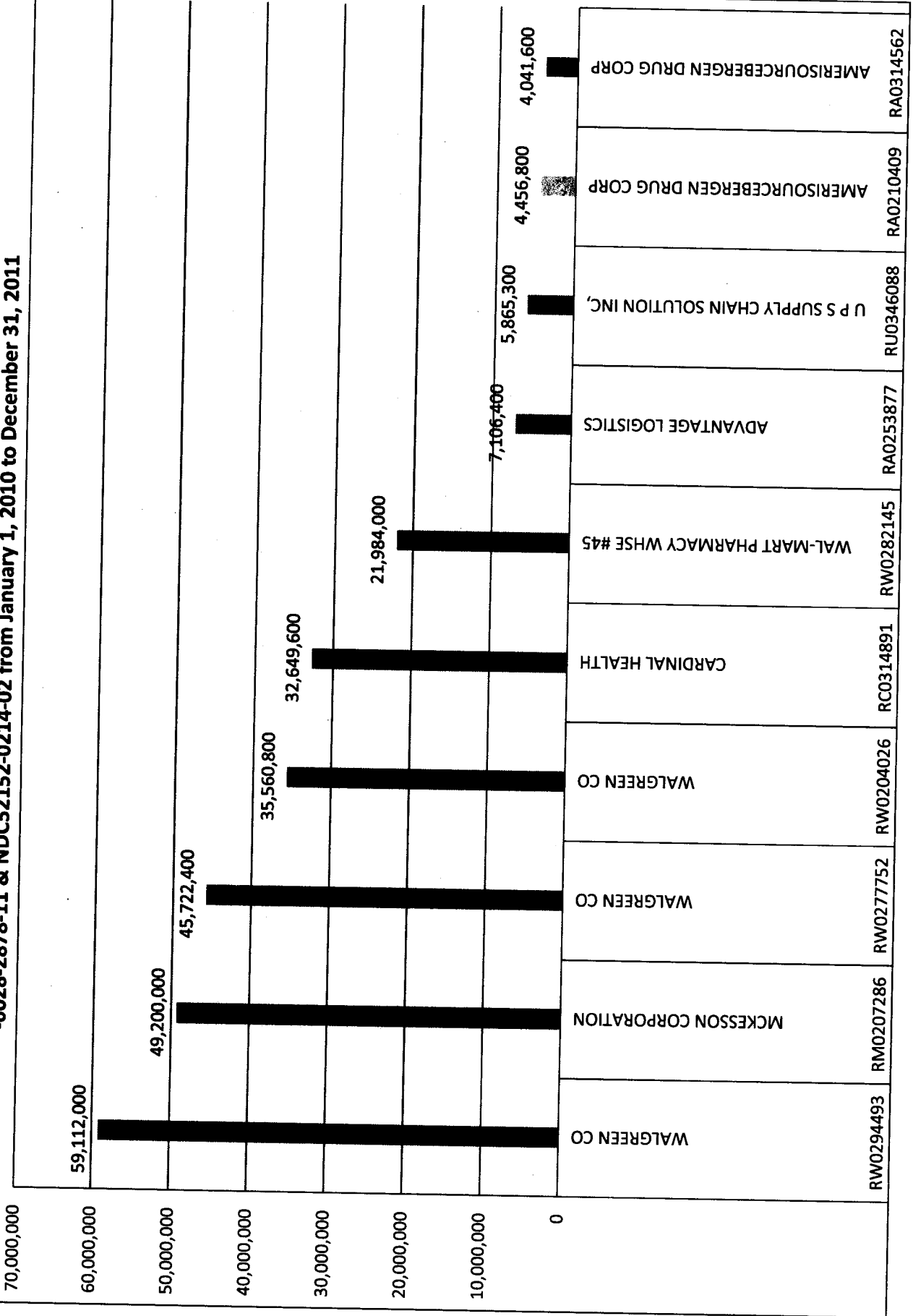
The mentioning of specific customers is NOT to be implied that the sale of controlled substances to these customers is illicit or that they may be involved in illicit activities.

It also should NOT be inferred that based upon the documentation provided to you that your company should terminate or restrict business with any customer discussed for the purposes of this presentation.

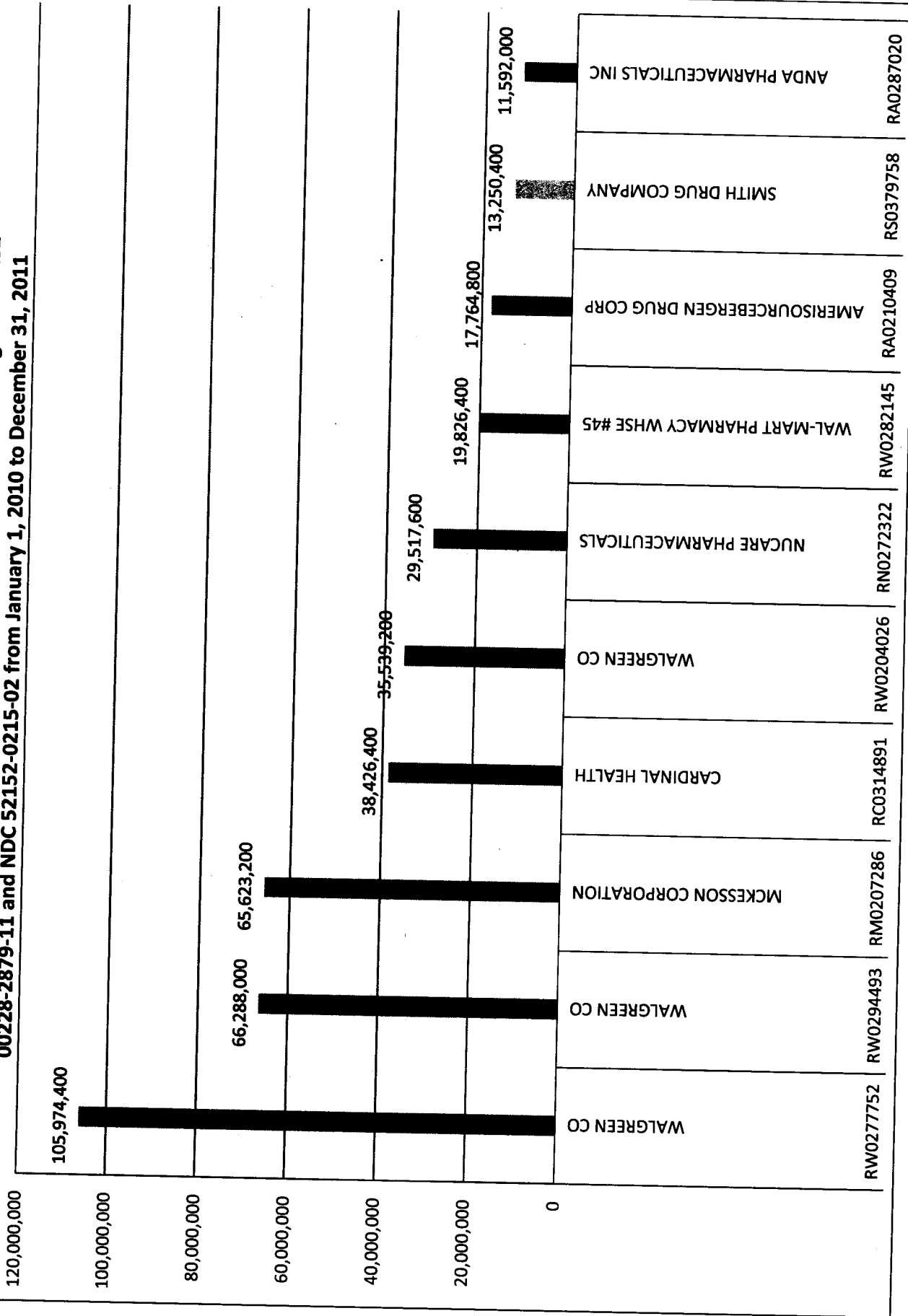
It is incumbent upon you to know your customers, fully review all orders for controlled substances and to exercise due diligence procedures prior to deciding whether or not to terminate or restrict sales to any customer.

September 12, 2012

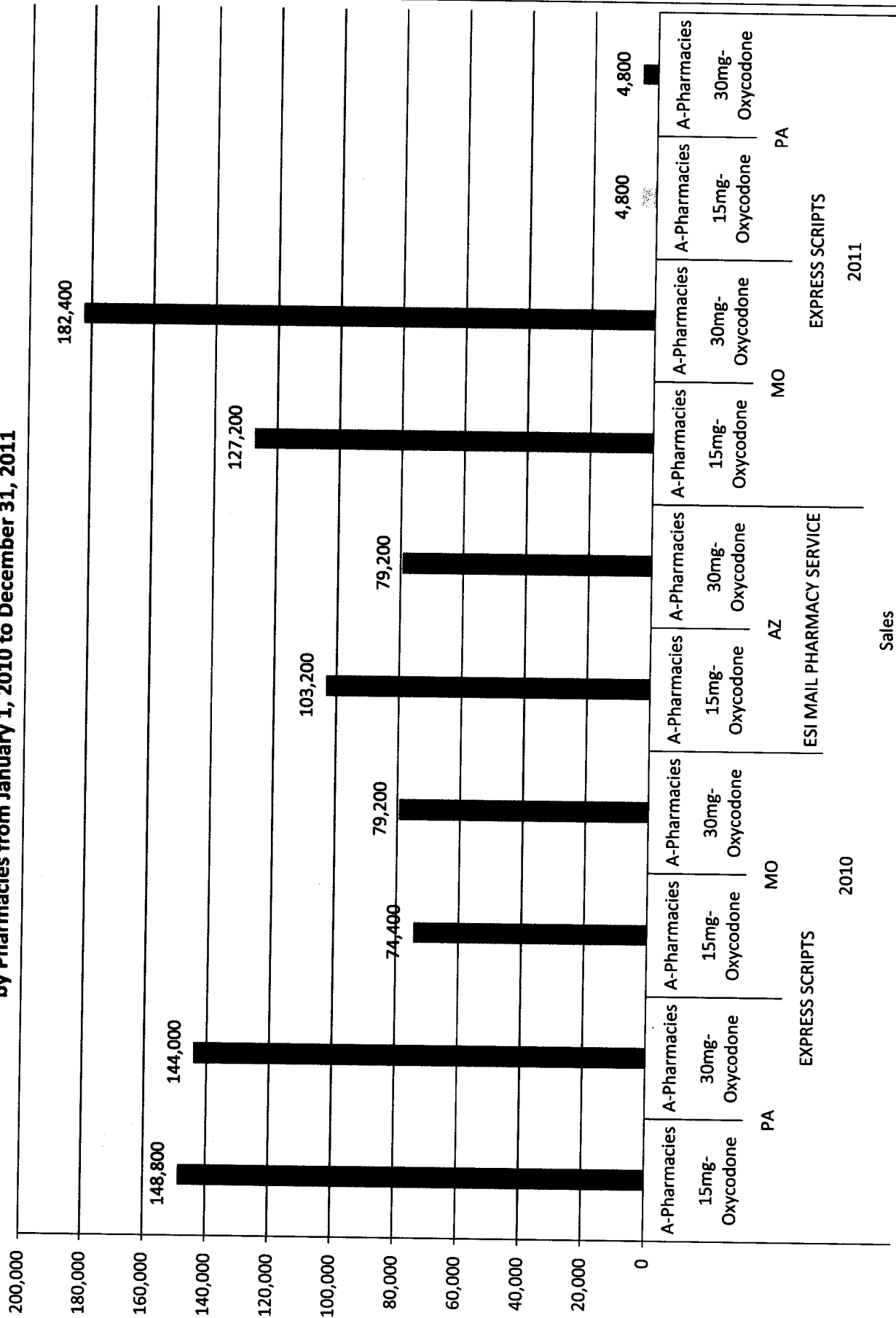
UPS Supply Chain Top Customer Sales in Dosage Units of Oxycodone 15mg NDC52152  
 -0028-2878-11 & NDC52152-0214-02 from January 1, 2010 to December 31, 2011



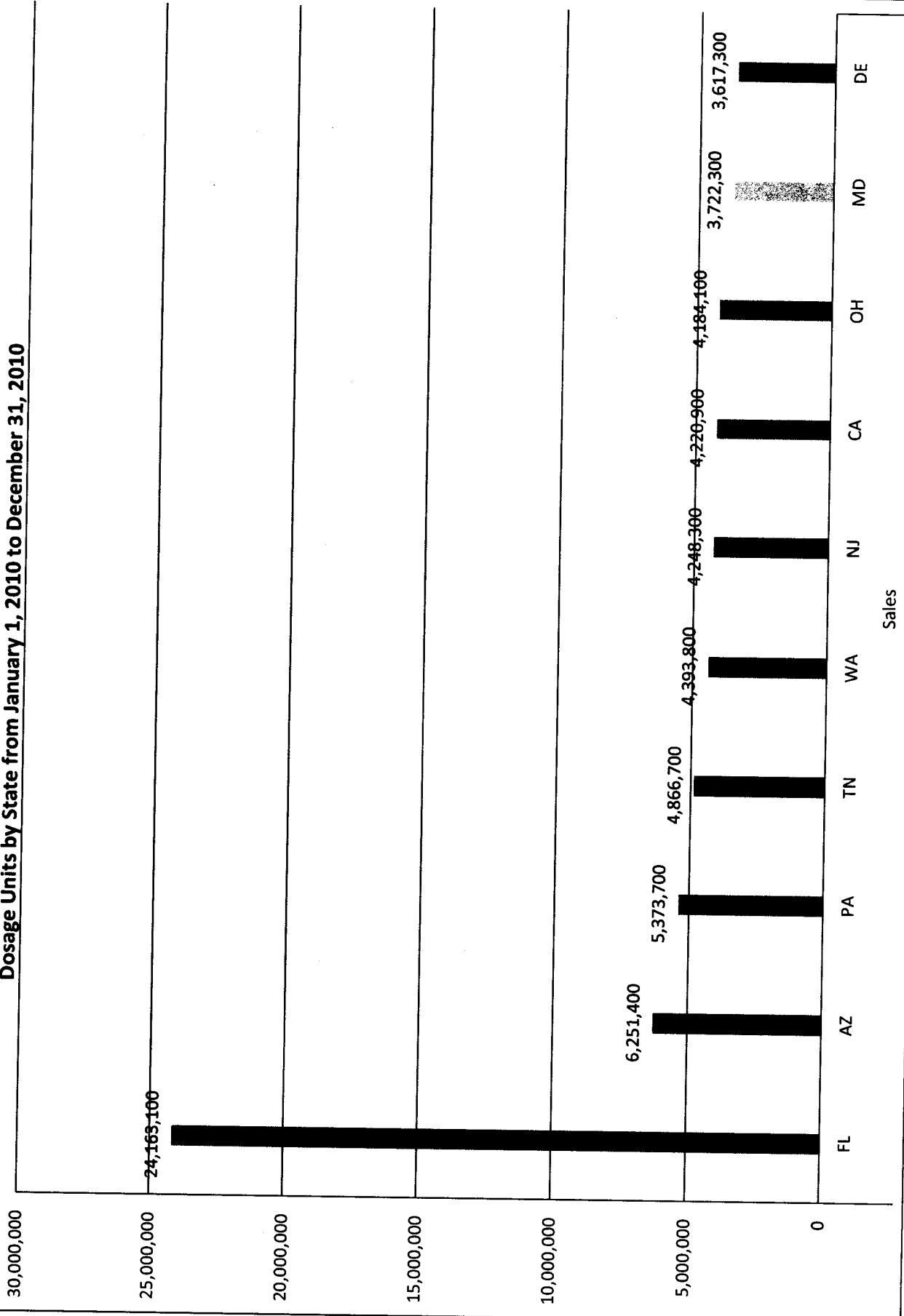
UPS Supply Chain Top Customer Sales in Dosage Units of Oxycodone 30mg NDC 52152-00228-2879-11 and NDC 52152-0215-02 from January 1, 2010 to December 31, 2011



**UPS Supply Chain Solutions, Inc. Purchases in Dosage Units  
by Pharmacies from January 1, 2010 to December 31, 2011**

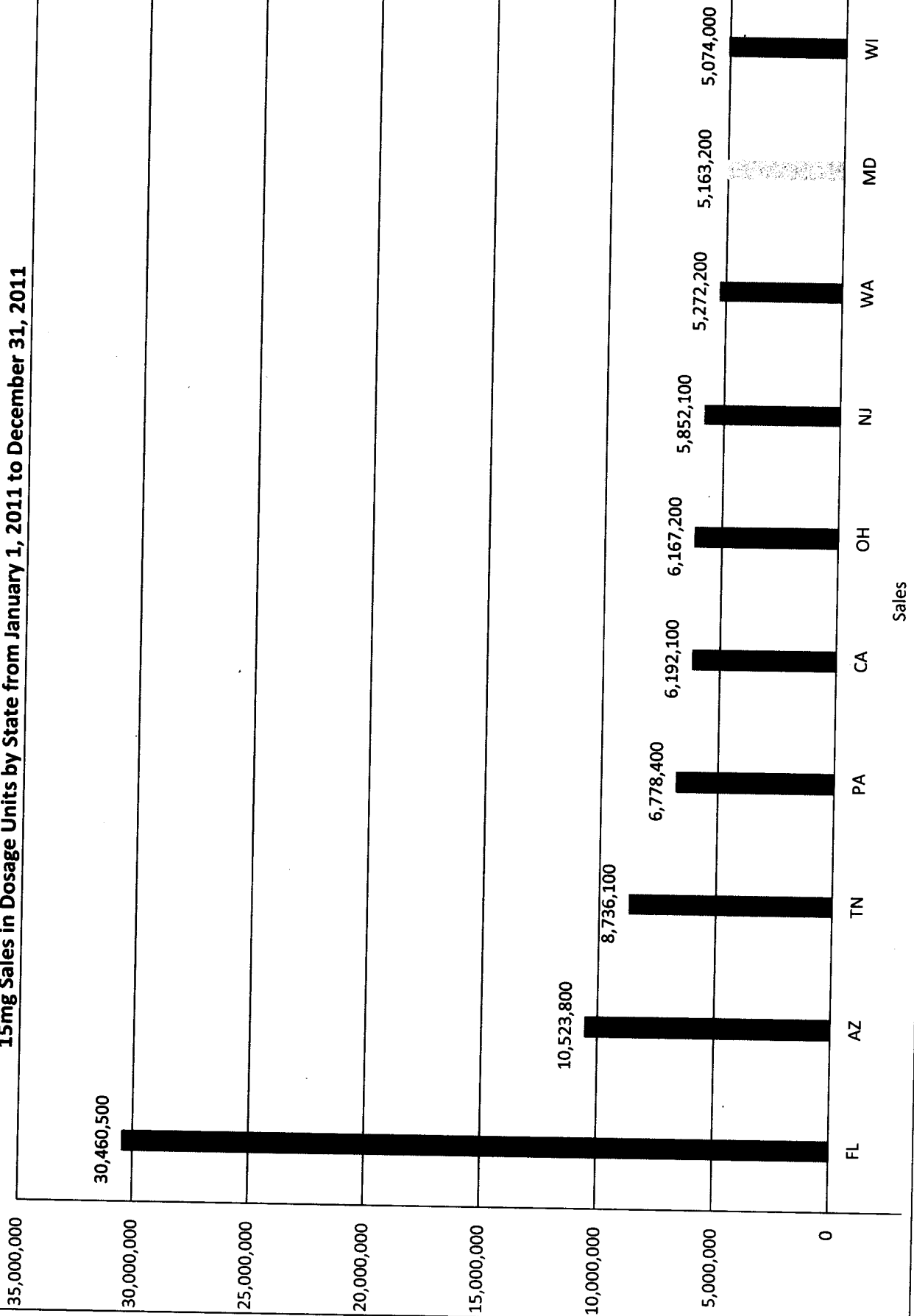


**Actavis Elizabeth, LLC (NDC52152-0214-02) Oxycodone 15mg Sales in Dosage Units by State from January 1, 2010 to December 31, 2010**

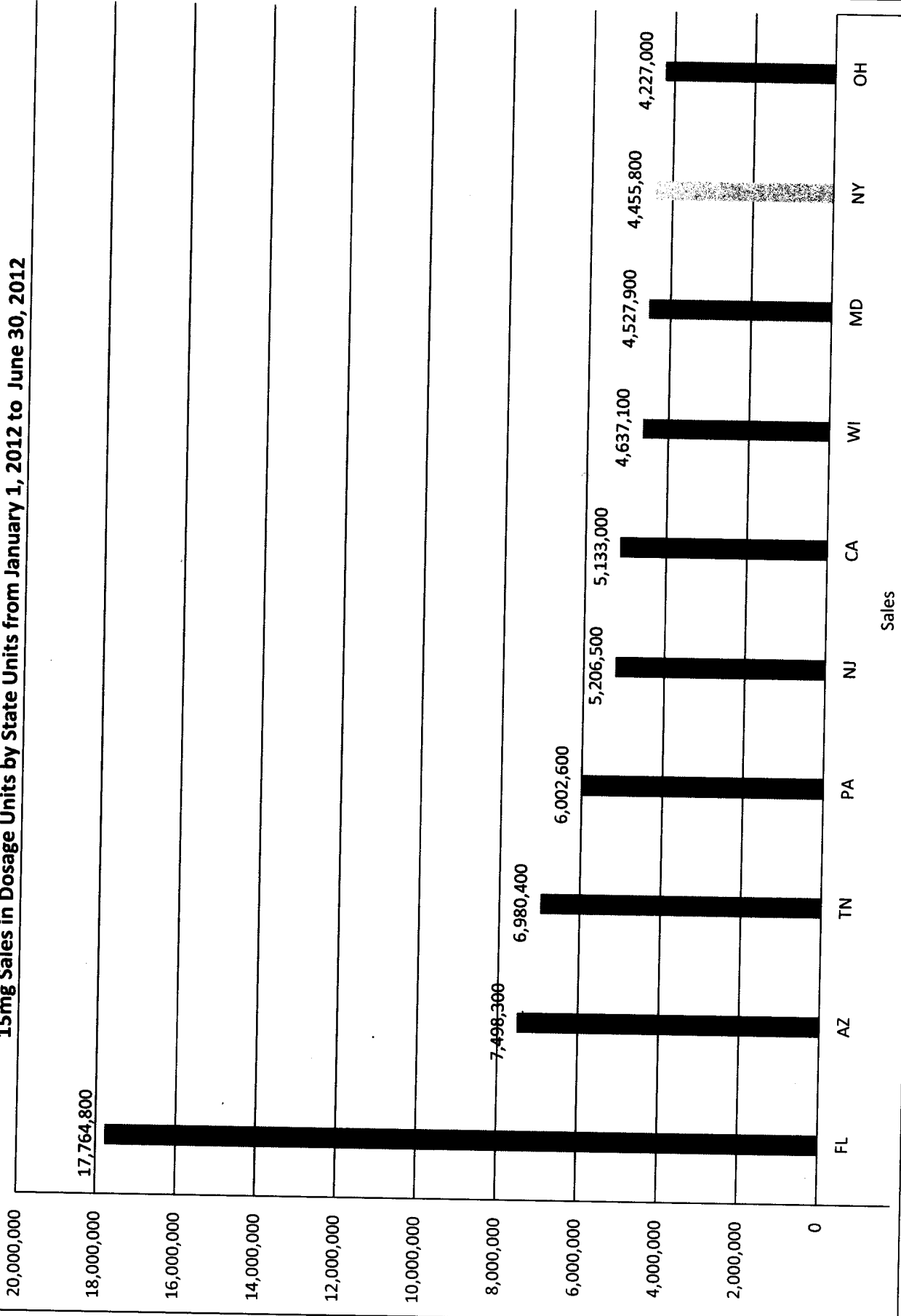




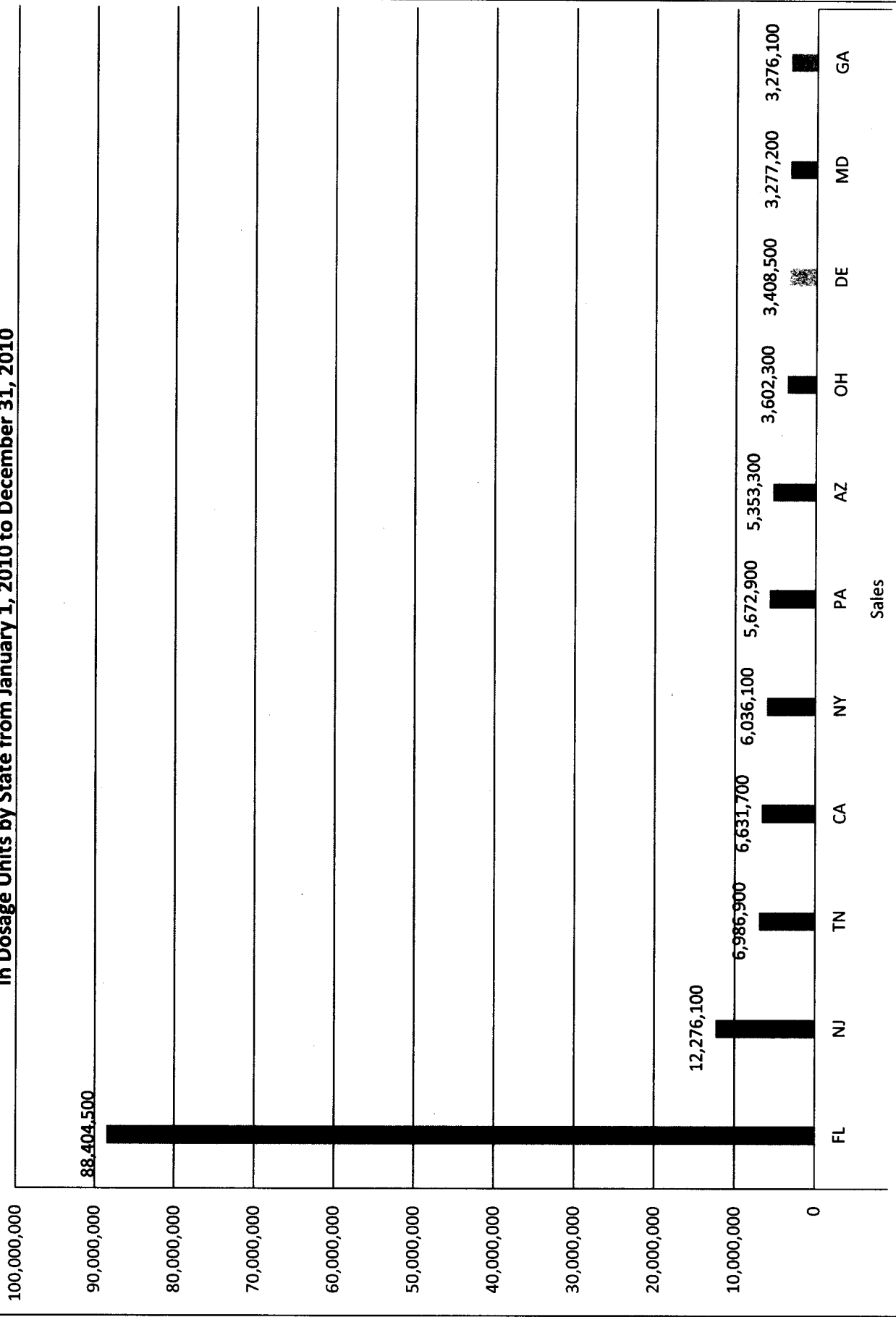
**Actavis Elizabeth, LLC (NDC00228-2878-11 & NDC52152-0214-02) Oxycodone  
15mg Sales in Dosage Units by State from January 1, 2011 to December 31, 2011**



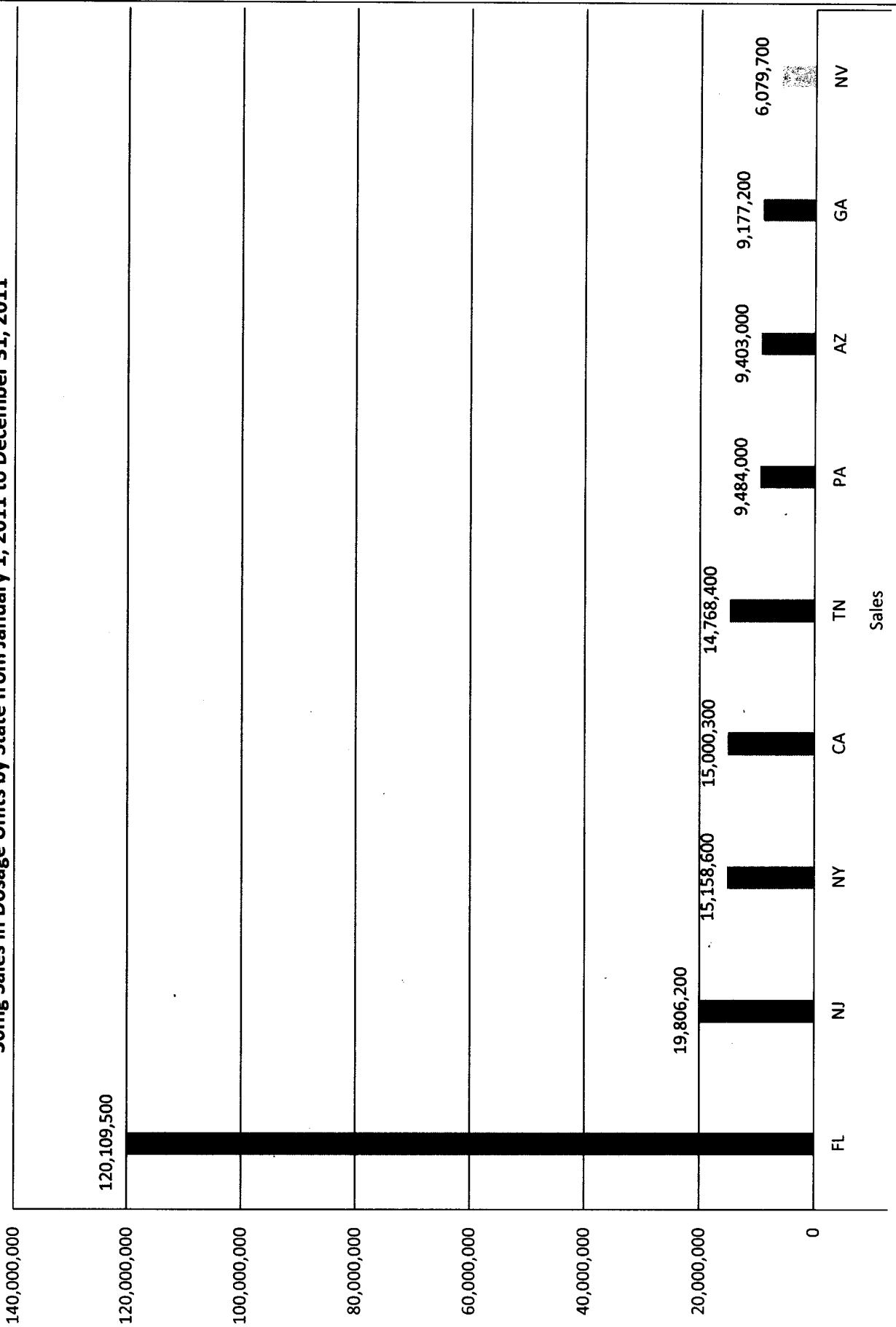
**Actavis Elizabeth, LLC (NDC00228-2878-11 & NDC52152-0214-02) Oxycodone  
15mg Sales in Dosage Units by State Units from January 1, 2012 to June 30, 2012**



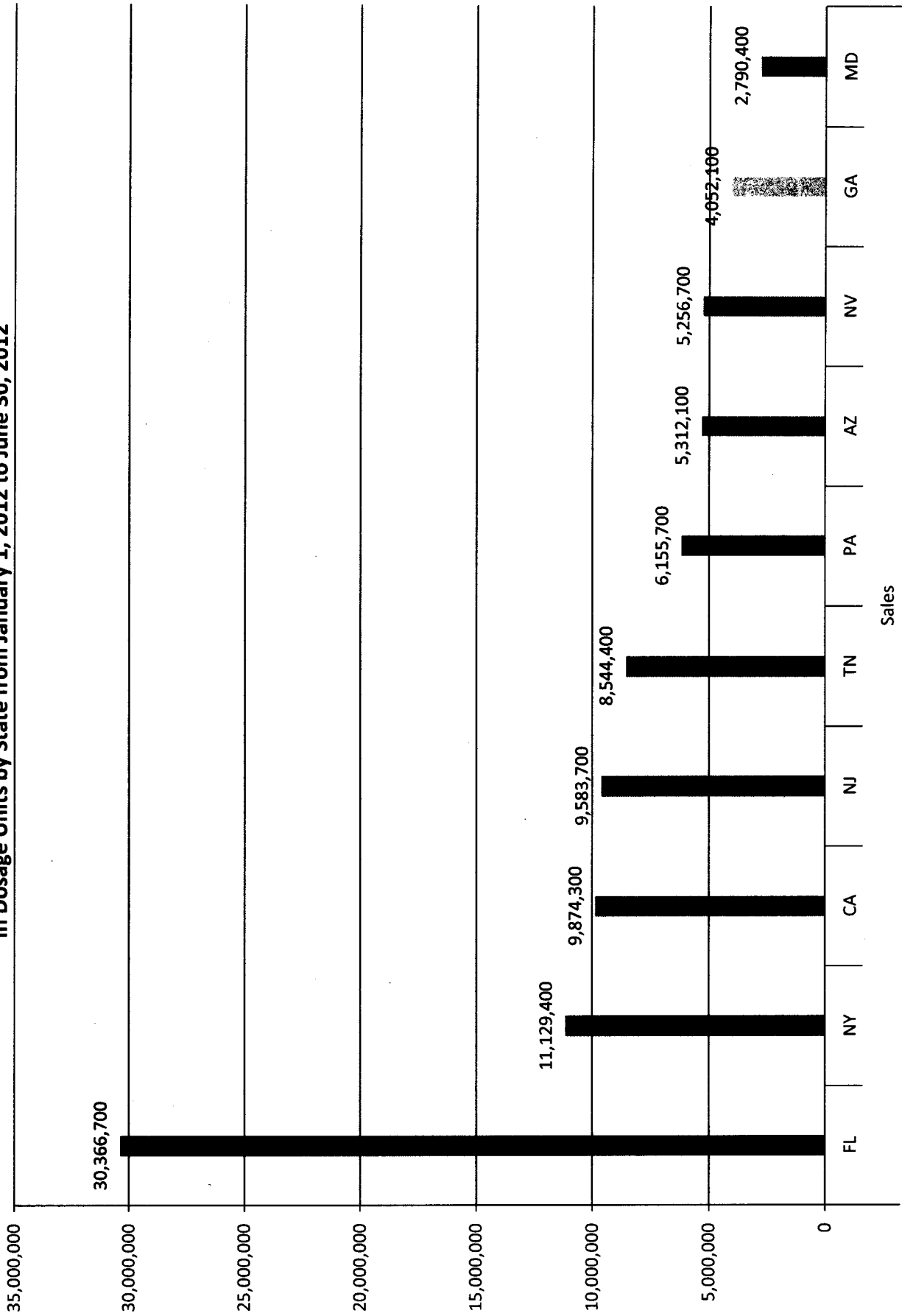
**Actavis Elizabeth, LLC (NDC52152-0215-02) Oxycodone 30mg Sales  
in Dosage Units by State from January 1, 2010 to December 31, 2010**



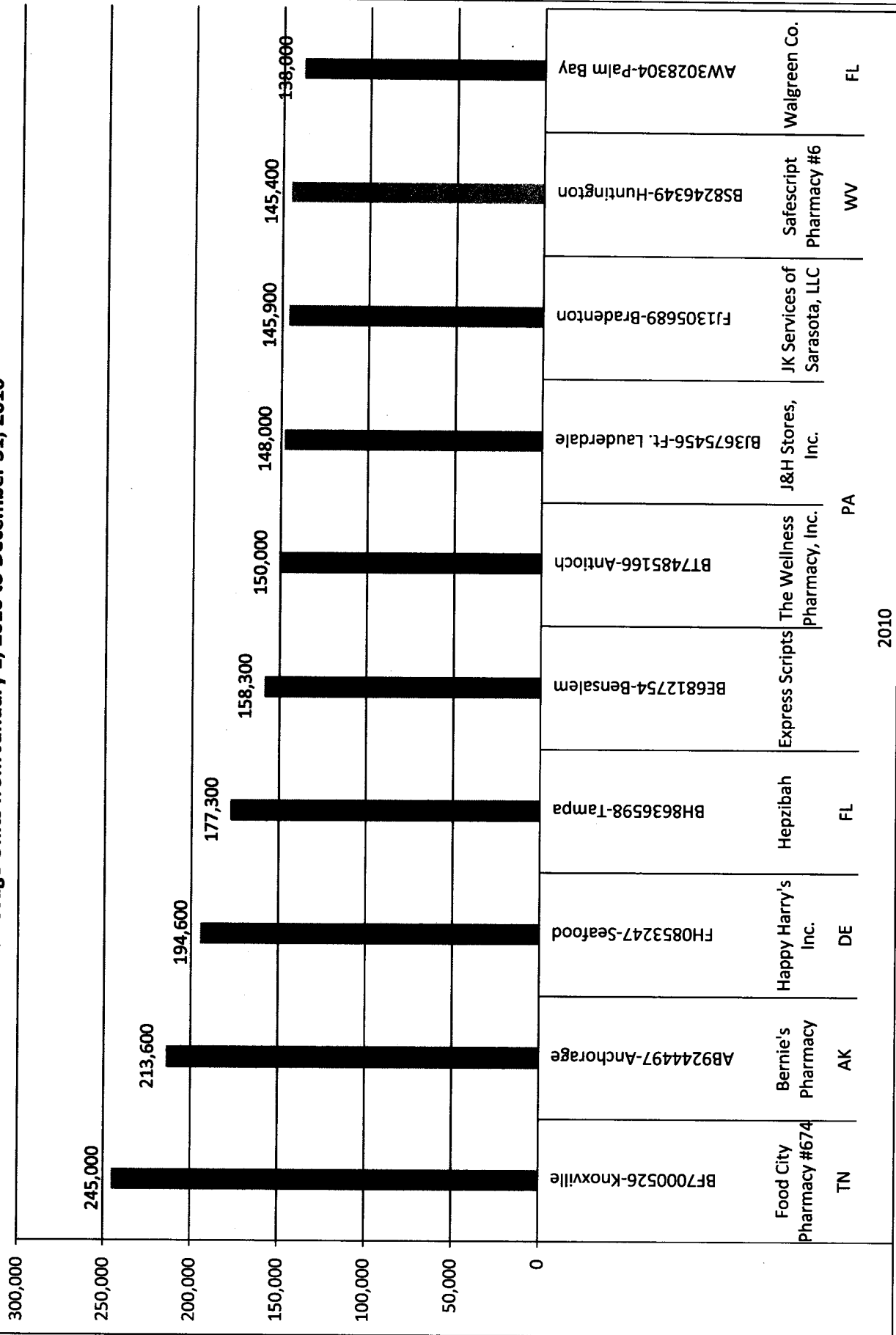
**Actavis Elizabeth, LLC (NDC00228-2879-11 & NDC52152-0215-02) Oxycodone  
30mg Sales in Dosage Units by State from January 1, 2011 to December 31, 2011**



**Actavis Elizabeth, LLC (NDC00228-2879-11) Oxycodone 30mg Sales  
in Dosage Units by State from January 1, 2012 to June 30, 2012**

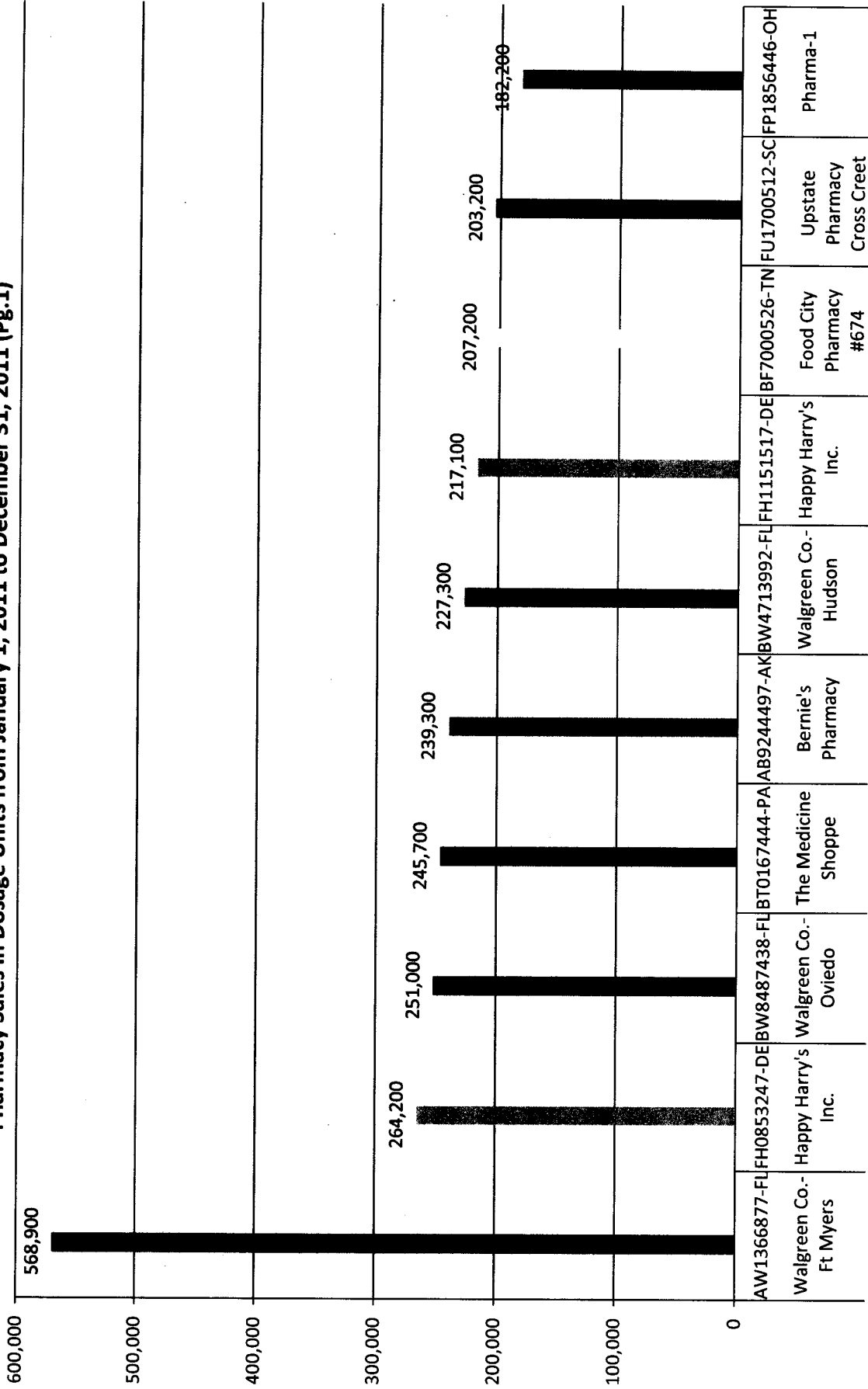


**Actavis Elizabeth, LLC (NDC 52152-0214-02) Oxycodone 15mg Pharmacy  
Sales in Dosage Units from January 1, 2010 to December 31, 2010**

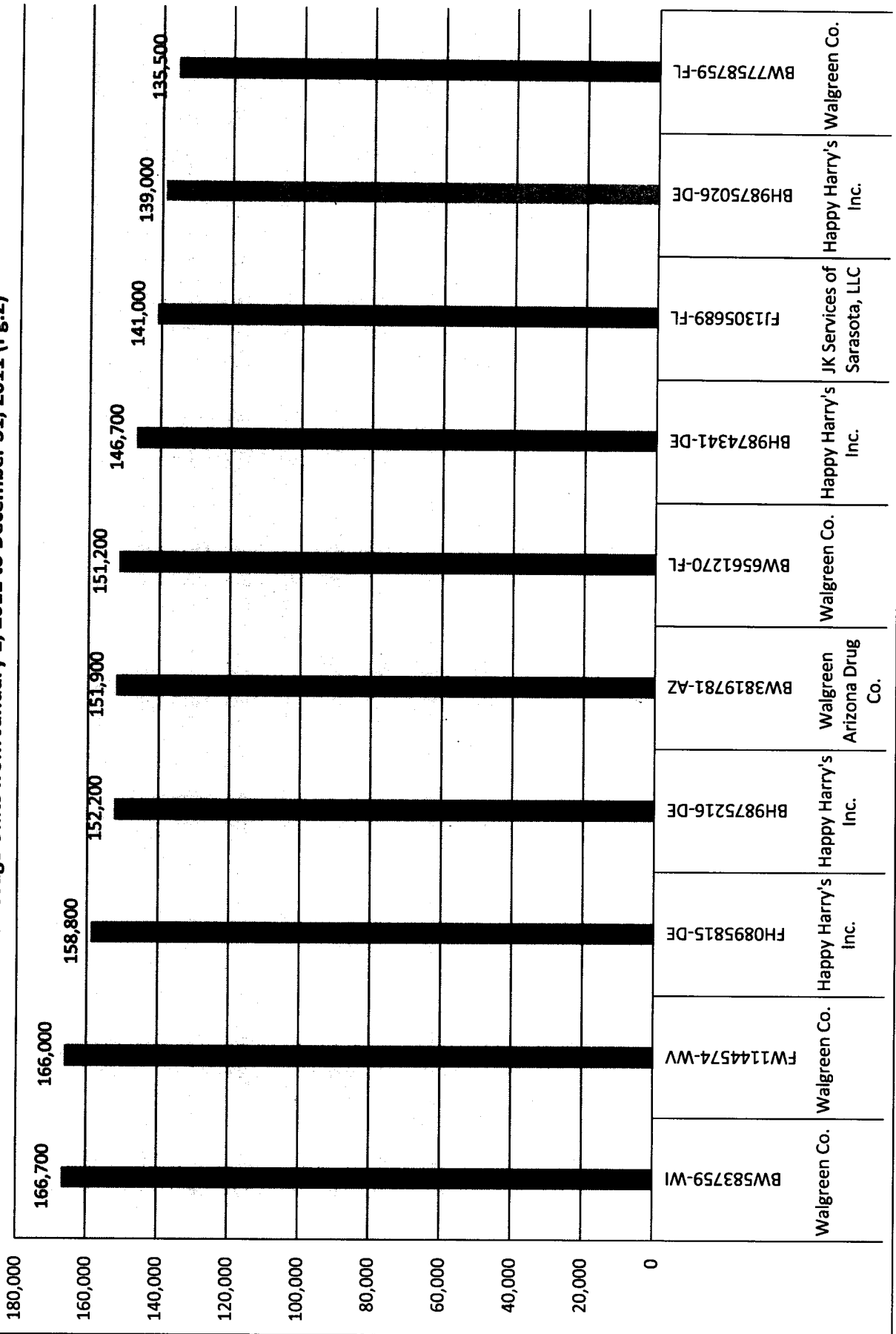


2010

**Actavis Elizabeth, LLC (NDC 002228-2878-11 & NDC-52152-0214-02) Oxycodone 15mg  
Pharmacy Sales in Dosage Units from January 1, 2011 to December 31, 2011 (Pg.1)**

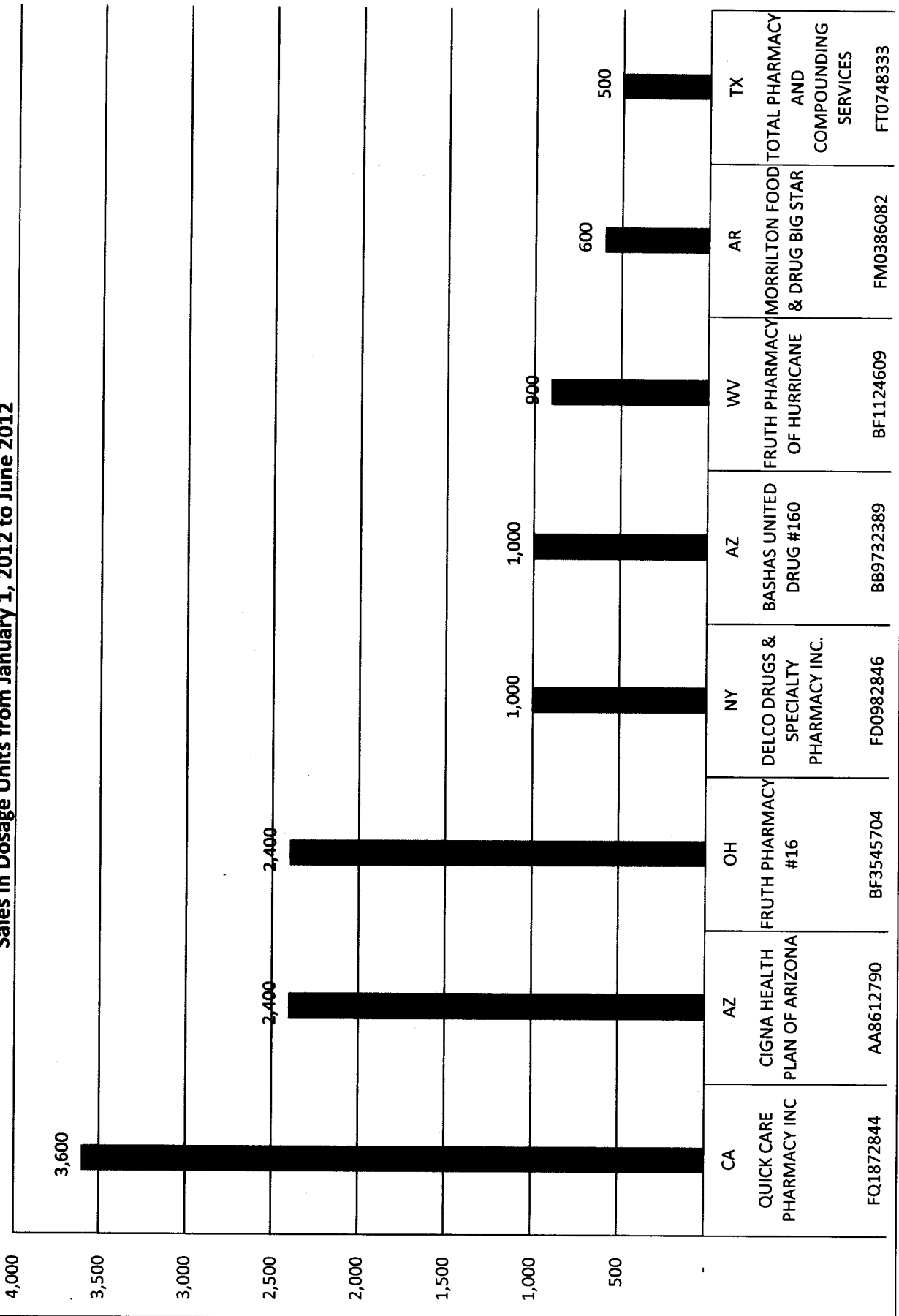


**Actavis Elizabeth, LLC (NDC 00228-2878-11) Oxycodone 15mg Pharmacy  
Sales in Dosage Units from January 1, 2011 to December 31, 2011 (Pg.2)**

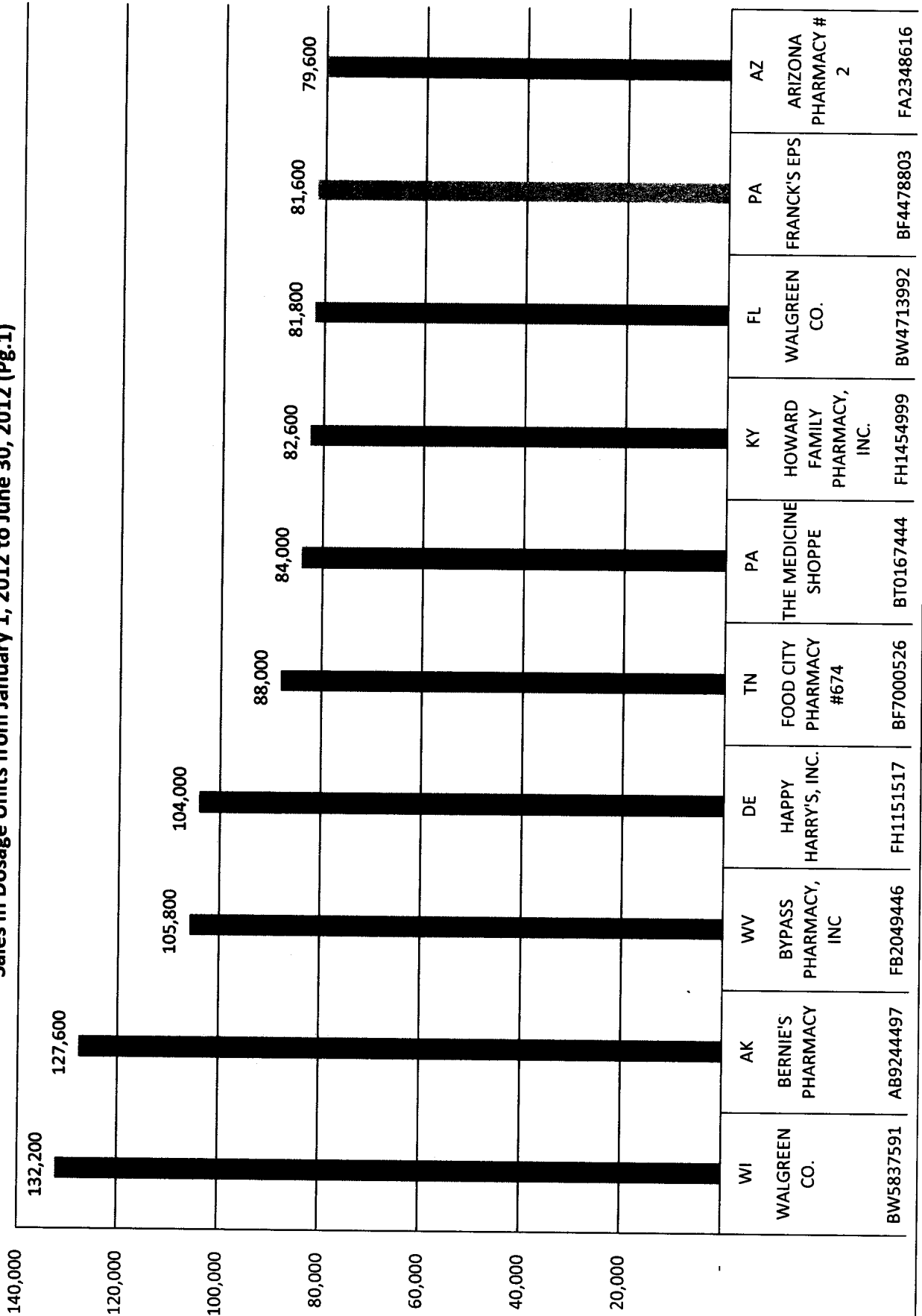




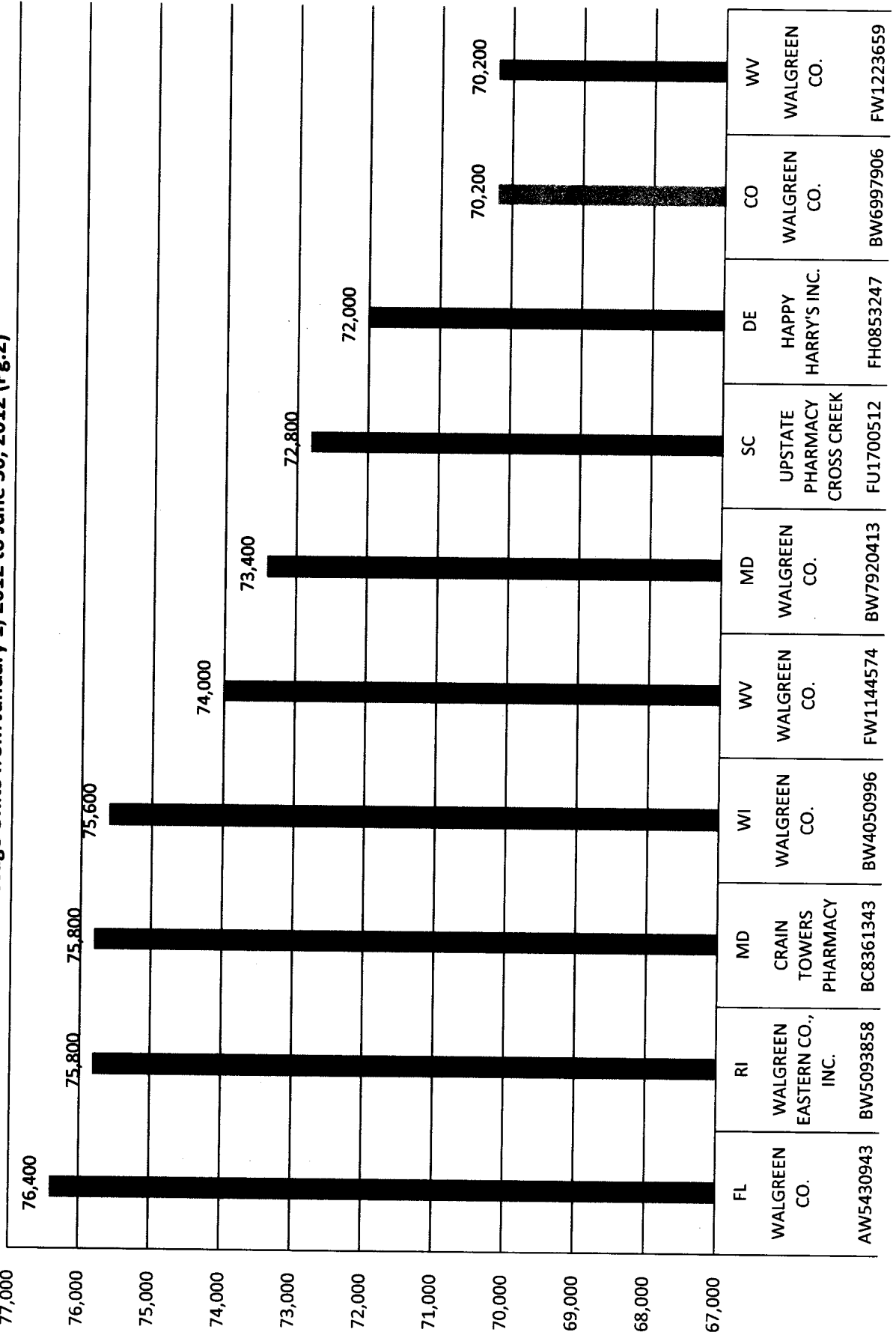
**Actavis Elizabeth, LLC Oxycodone 15mg (NDC 52152-0214-02)  
Sales in Dosage Units from January 1, 2012 to June 2012**



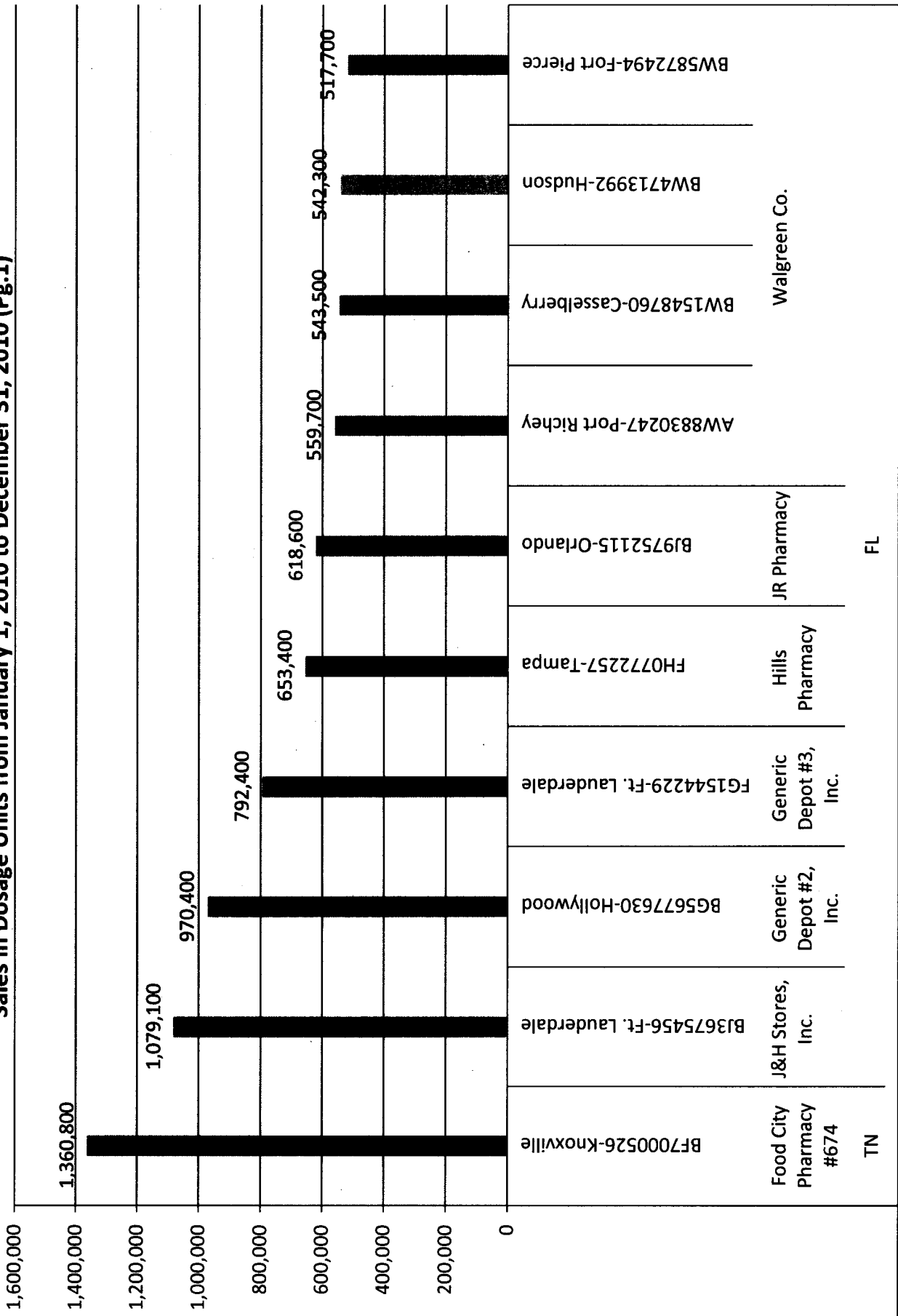
**Actavis Elizabeth, LLC Oxycodone 15mg. (NDC00228-2878-11)  
Sales in Dosage Units from January 1, 2012 to June 30, 2012 (Pg.1)**



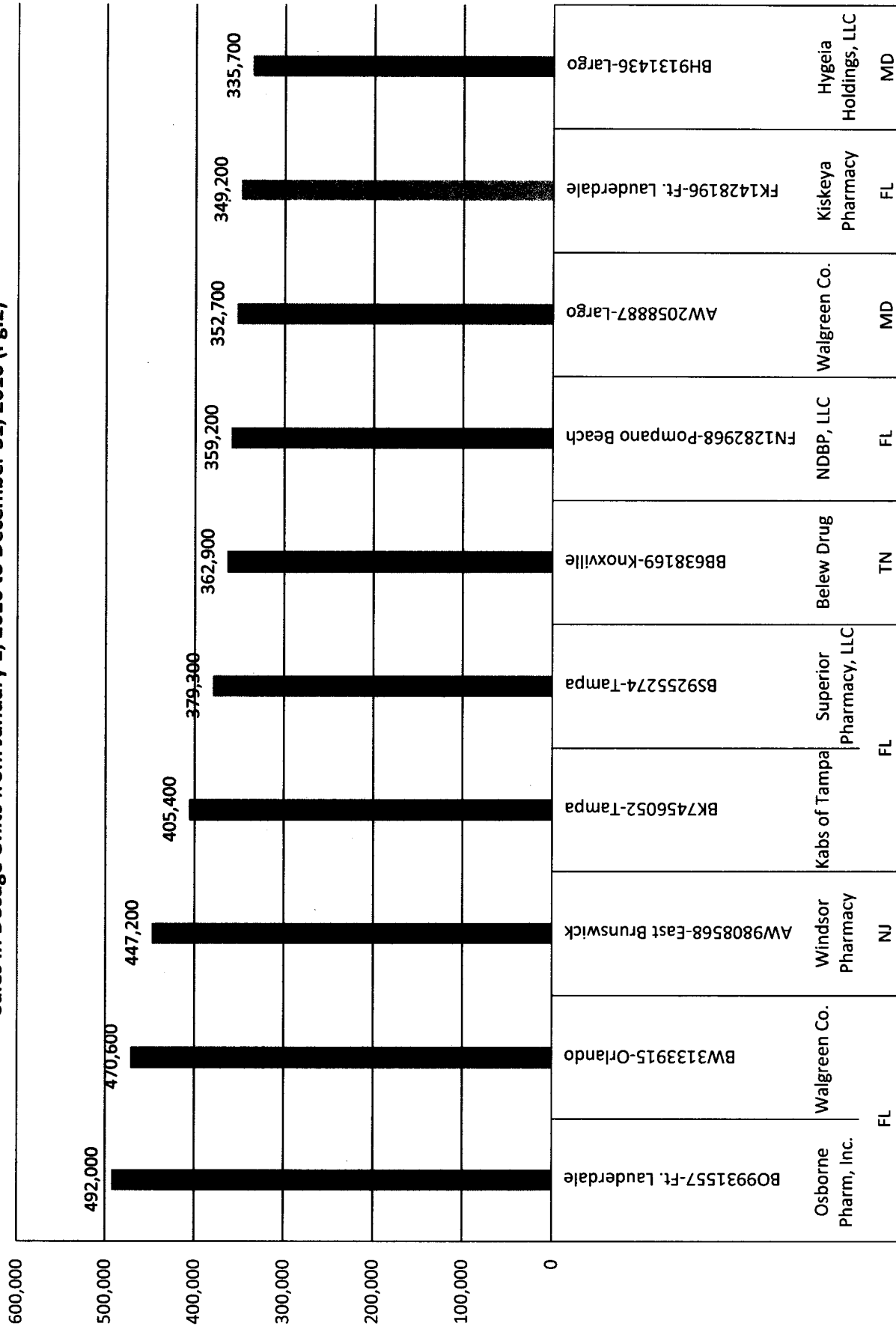
**Actavis Elizabeth, LLC Oxycodone 15mg. (NDC 00228-2878-11)  
Sales in Dosage Units from January 1, 2012 to June 30, 2012 (Pg.2)**



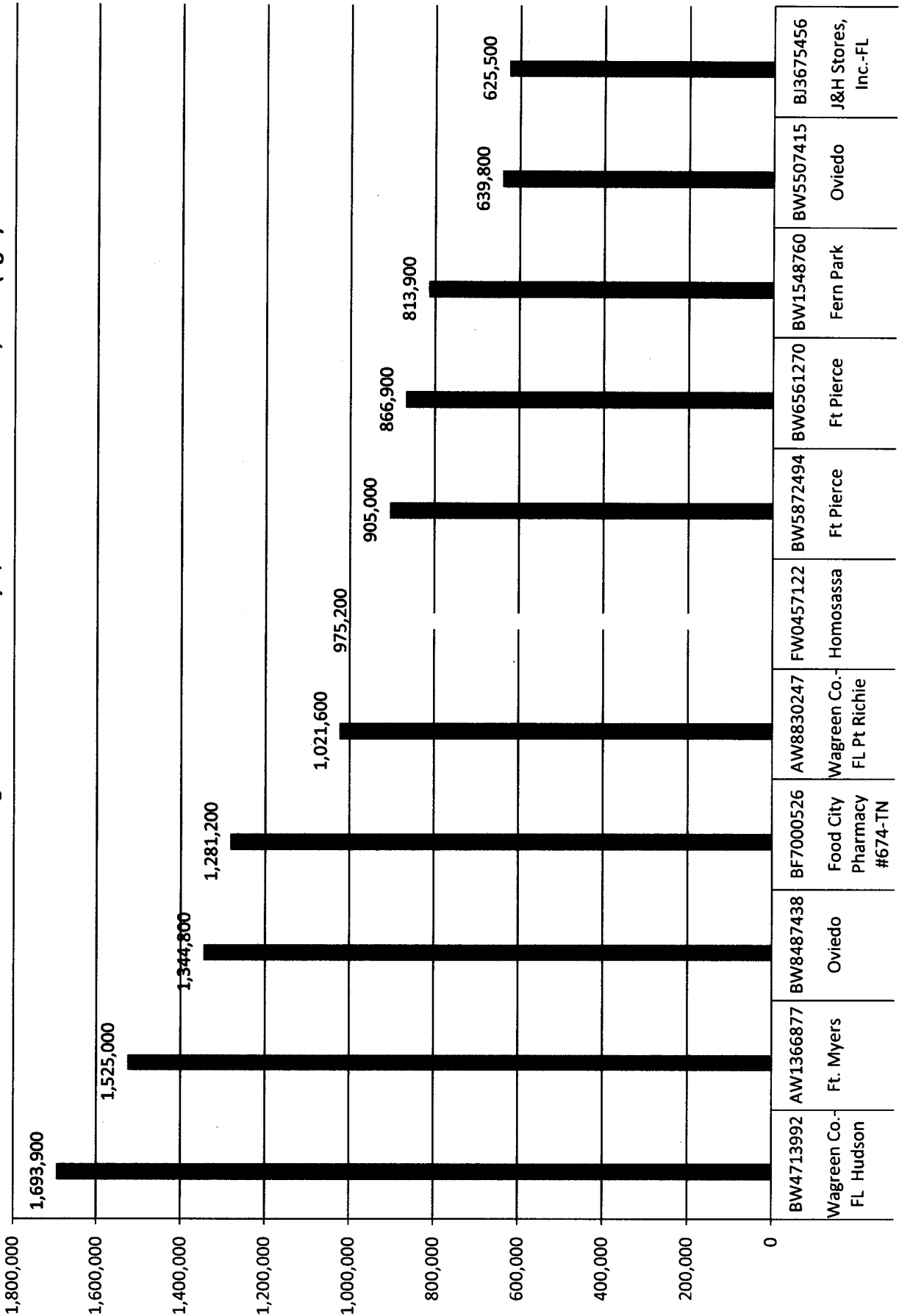
**Actavis Elizabeth, LLC (NDC 52152-0215-02) Oxycodone 30mg Customer  
Sales in Dosage Units from January 1, 2010 to December 31, 2010 (Pg.1)**



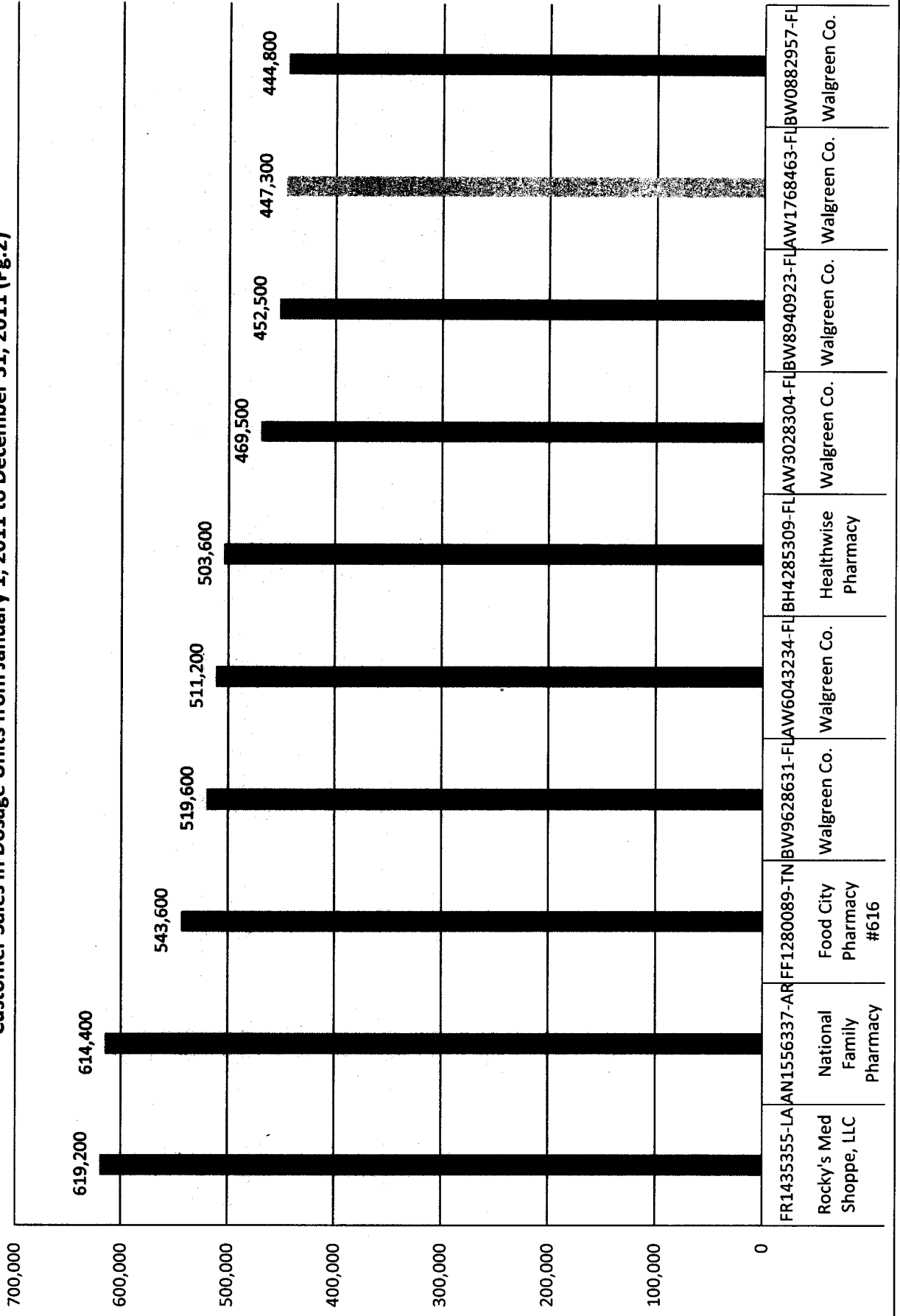
**Actavis Elizabeth, LLC Oxycodone 30mg (NDC 52152-0215-02) Customer Sales in Dosage Units from January 1, 2010 to December 31, 2010 (Pg.2)**



**Actavis Elizabeth, LLC (NDC 00228-2879-11 & NDC 52152-0215-02) Oxycodone 30mg  
Customer Sales in Dosage Units from January 1, 2011 to December 31, 2011 (Pg.1)**

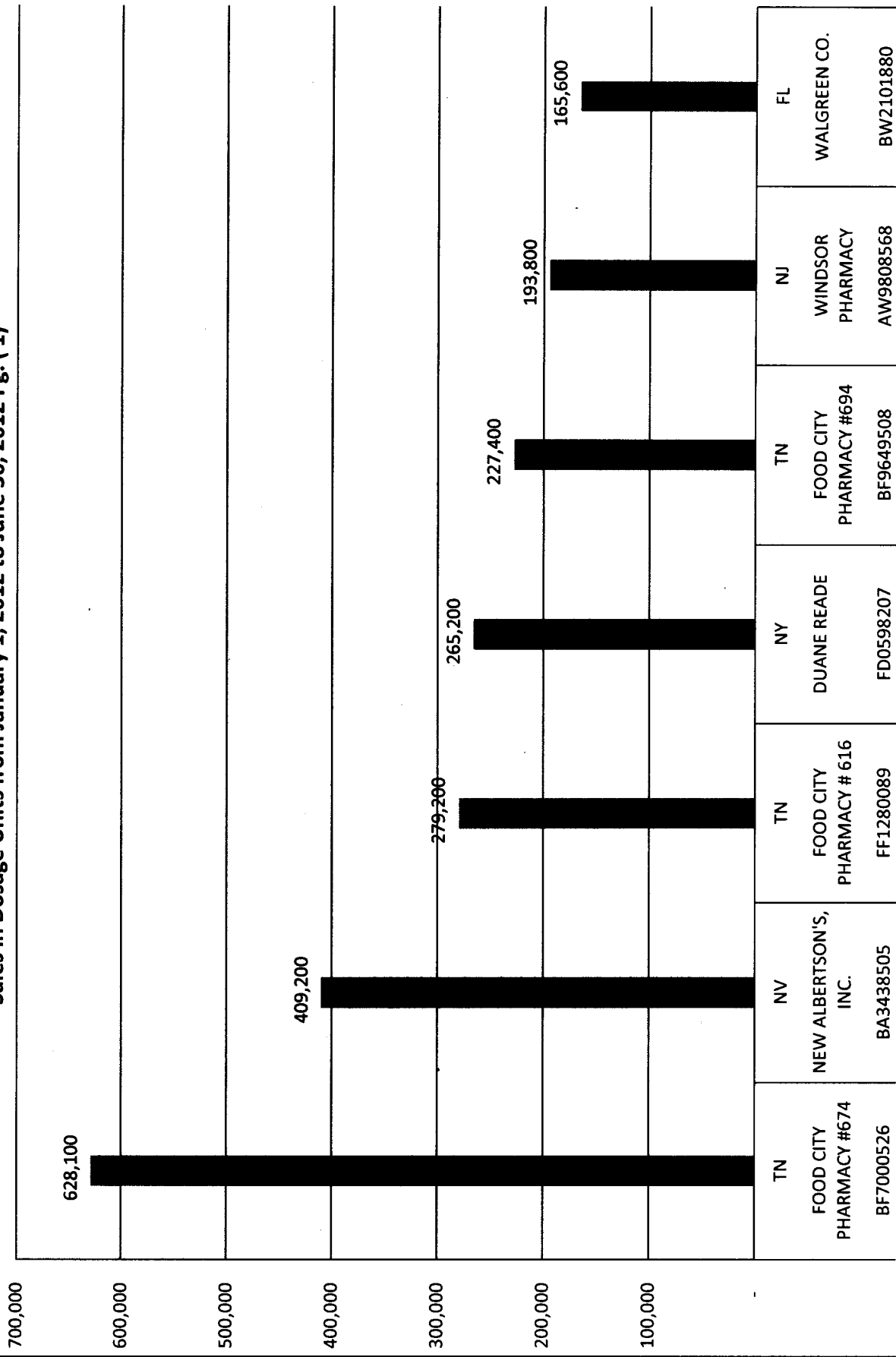


**Actavis Elizabeth, LLC (NDC 00228-2879-11 & NDC 52152-0215-02) Oxycodone 30mg  
Customer Sales in Dosage Units from January 1, 2011 to December 31, 2011 (Pg.2)**



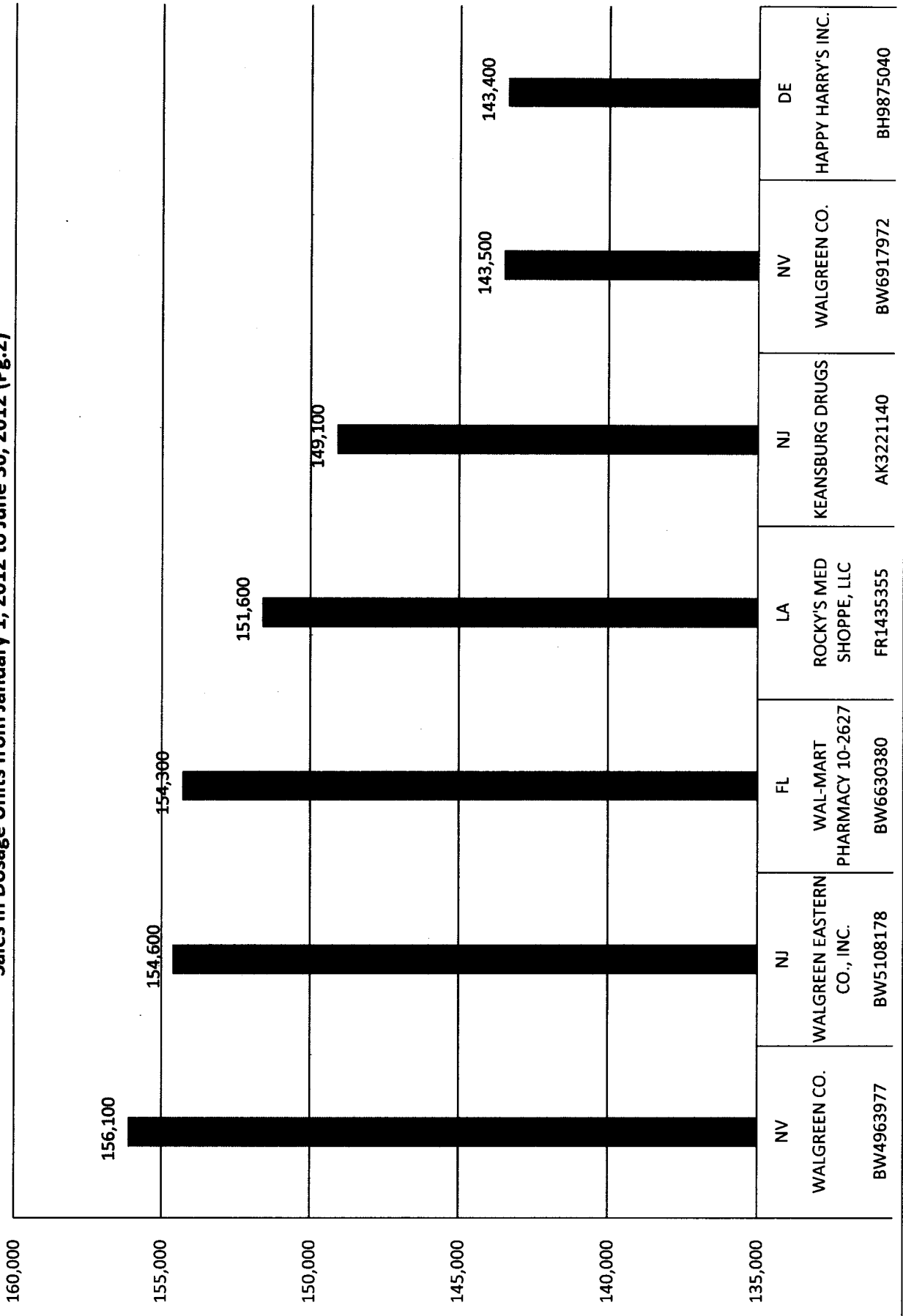
FR1435355-LA	AN1556337-AR	FF1280089-TN	BW9628631-FL	AW6043234-FL	BH4285309-FL	AW3028304-FL	BW8940923-FL	AW1768463-FL	BW0882957-FL
Rocky's Med Shoppe, LLC	National Family Pharmacy	Food City Pharmacy #616	Walgreen Co.	Walgreen Co.	Healthwise Pharmacy	Walgreen Co.	Walgreen Co.	Walgreen Co.	Walgreen Co.

**Actavis Elizabeth, LLC Oxycodone 30mg. (NDC 00228-2879-11)  
Sales in Dosage Units from January 1, 2012 to June 30, 2012 Pg. ( 1 )**

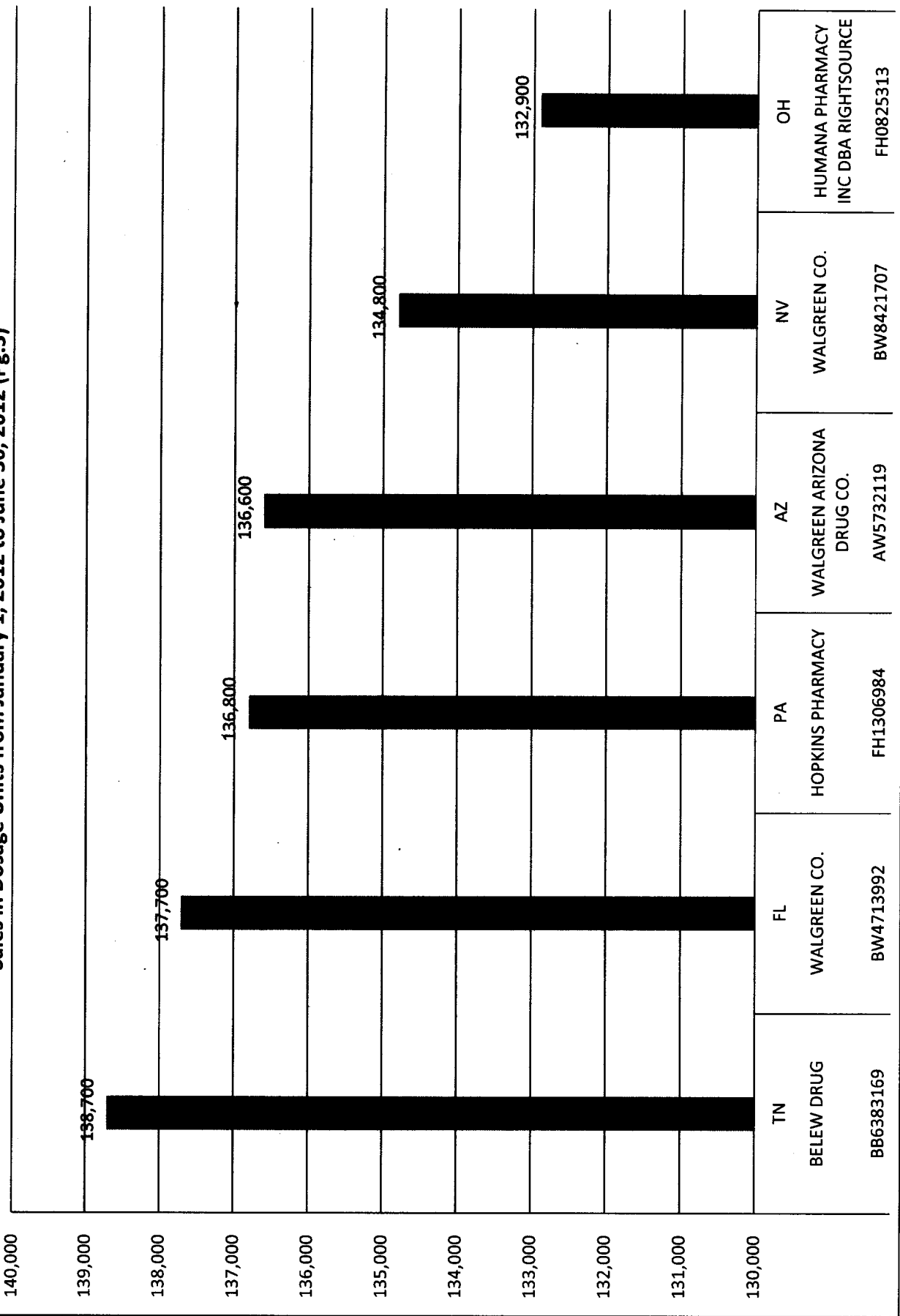




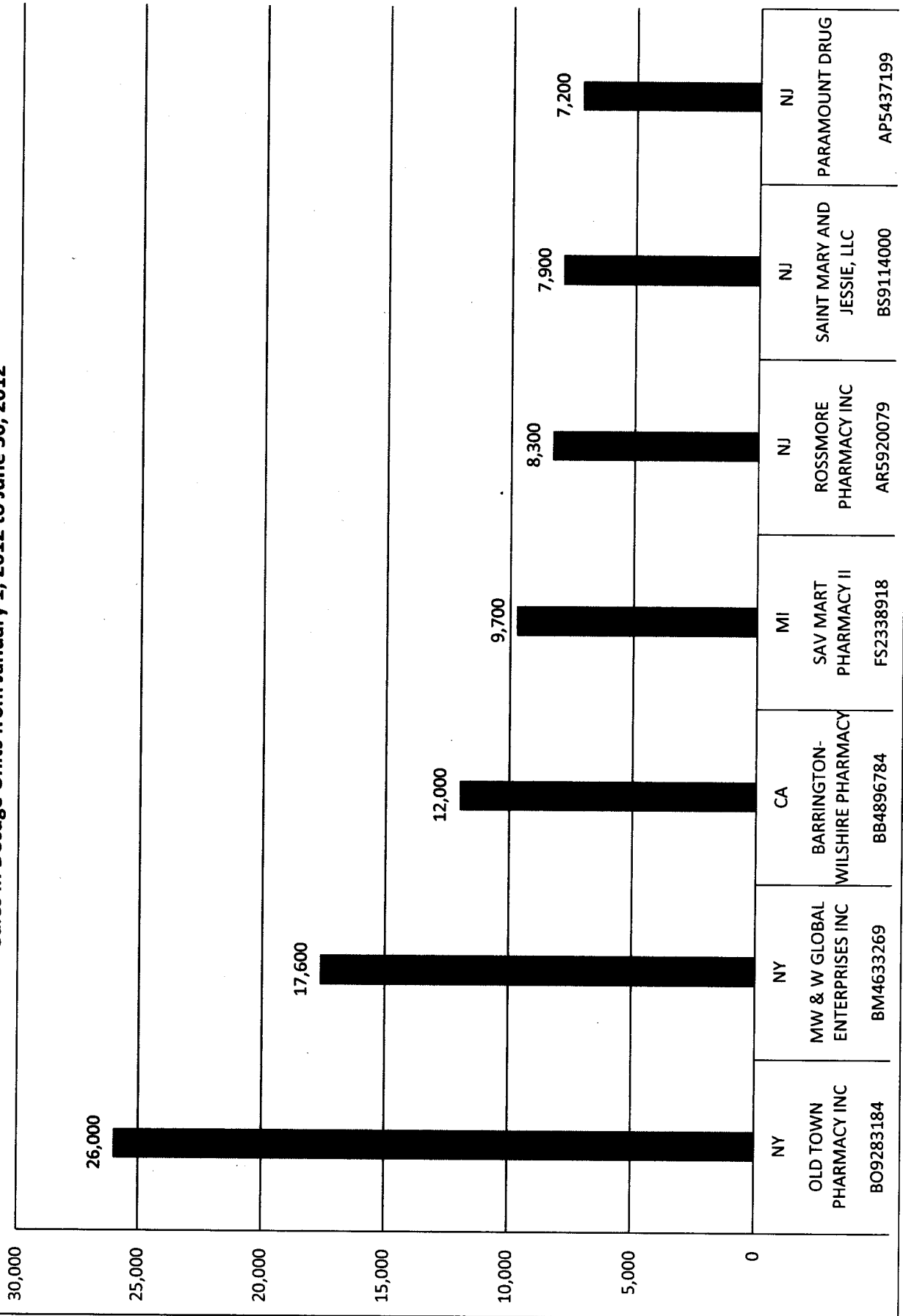
**Actavis Elizabeth, LLC Oxycodone 30mg. (NDC 00228-2879-11)  
Sales in Dosage Units from January 1, 2012 to June 30, 2012 (Pg.2)**



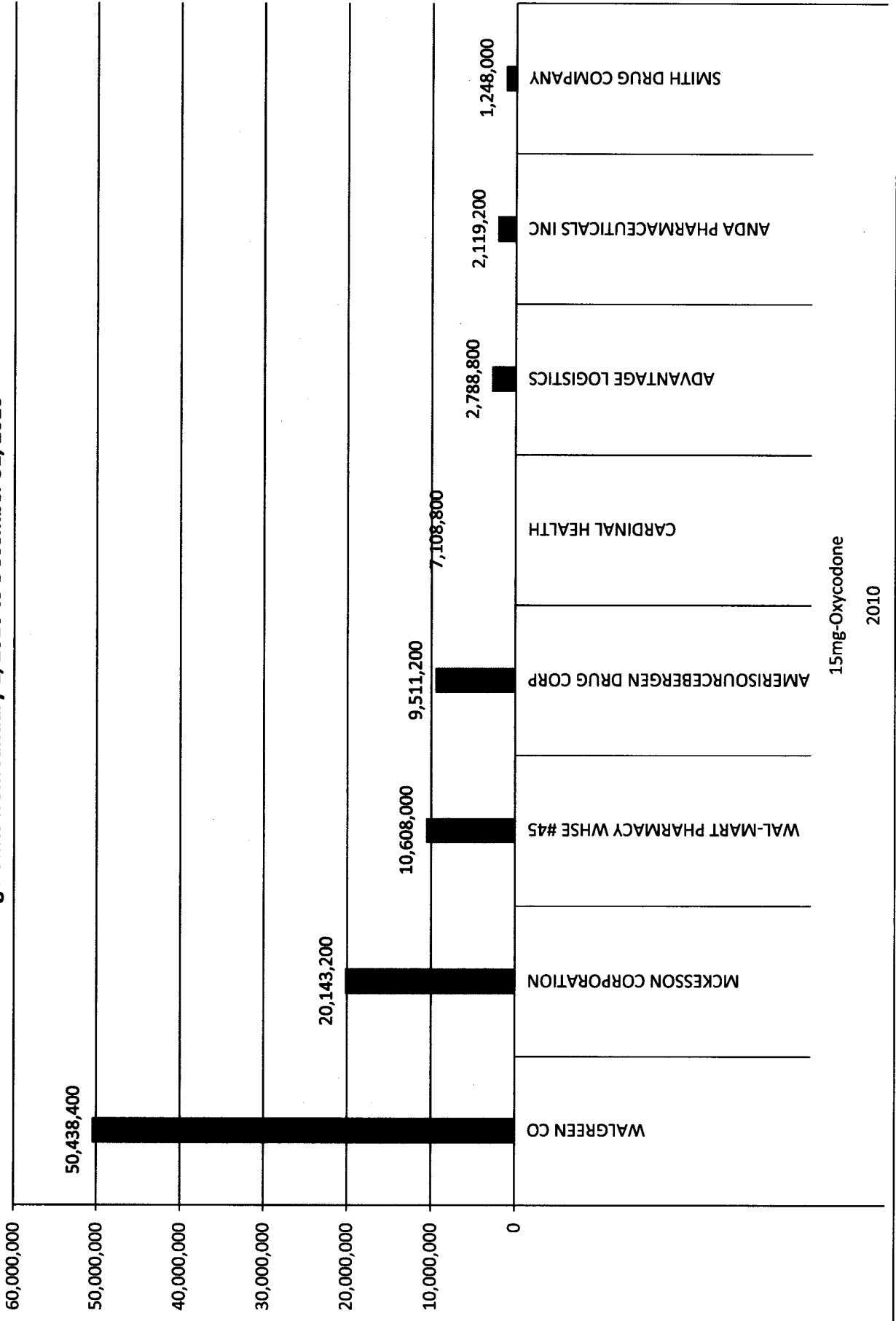
**Actavis Elizabeth, LLC Oxycodone 30mg. (NDC 00228-2879-11)  
Sales in Dosage Units from January 1, 2012 to June 30, 2012 (Pg.3)**



**Actavis Elizabeth, LLC Oxycodone 30mg. (NDC 52152-0215-02)  
Sales in Dosage Units from January 1, 2012 to June 30, 2012**



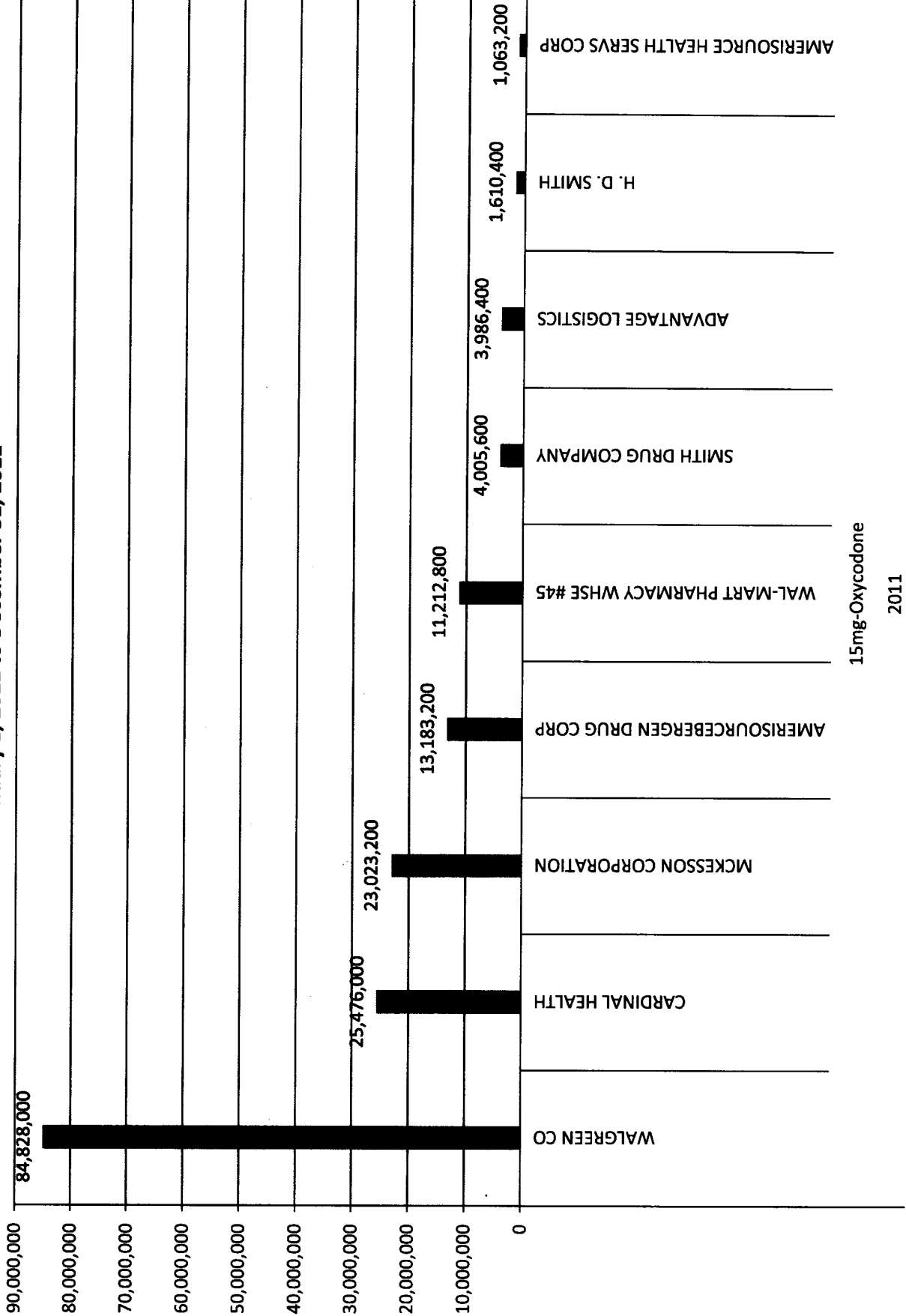
**UPS Supply Chain Solutions, Inc. (RU0346088) KY Sales in Dosage Units from January 1, 2010 to December 31, 2010**



15mg-Oxycodone

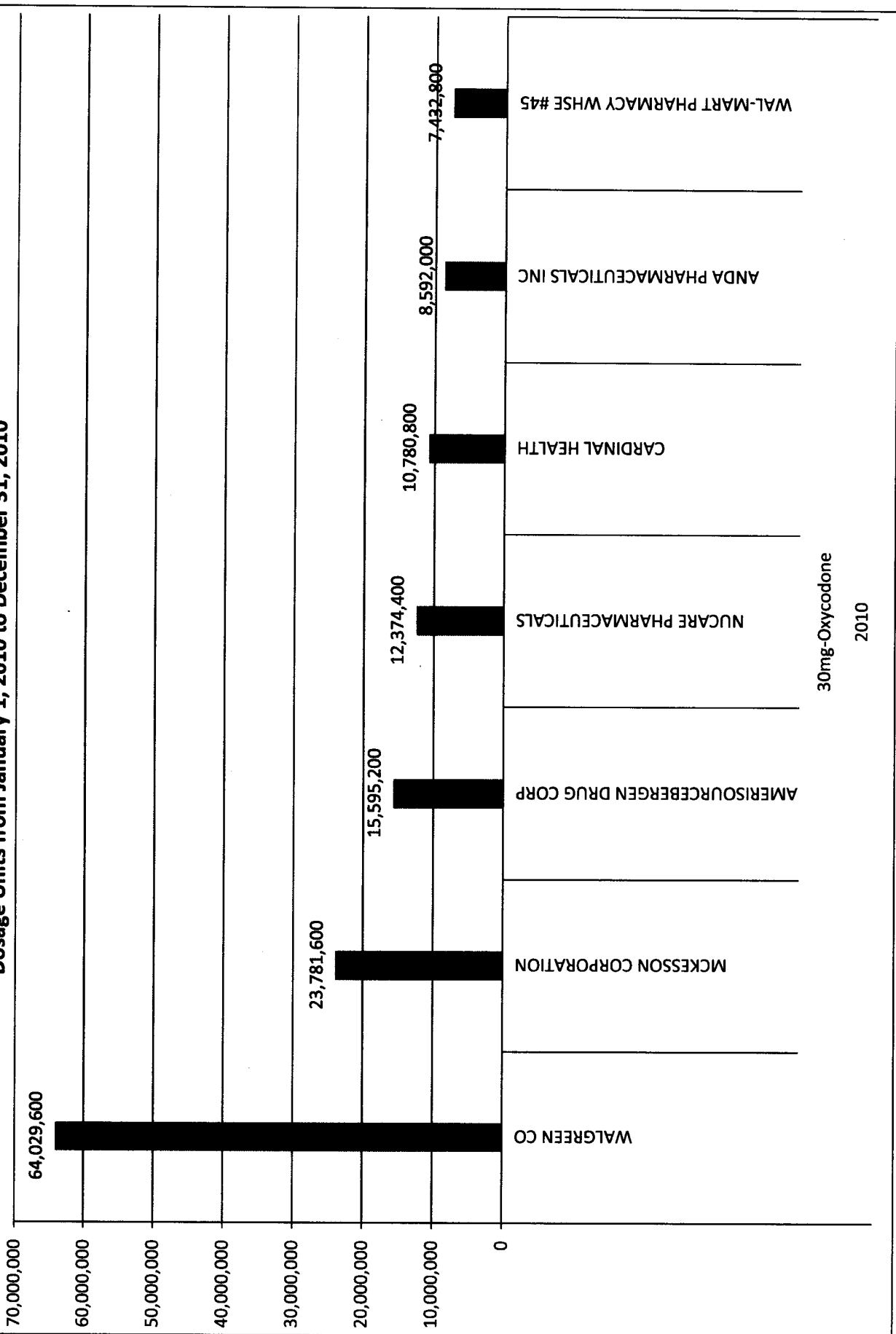
2010

UPS Supply Chain Solutions (RU0346088) KY Sales in Dosage  
 Units from January 1, 2011 to December 31, 2011



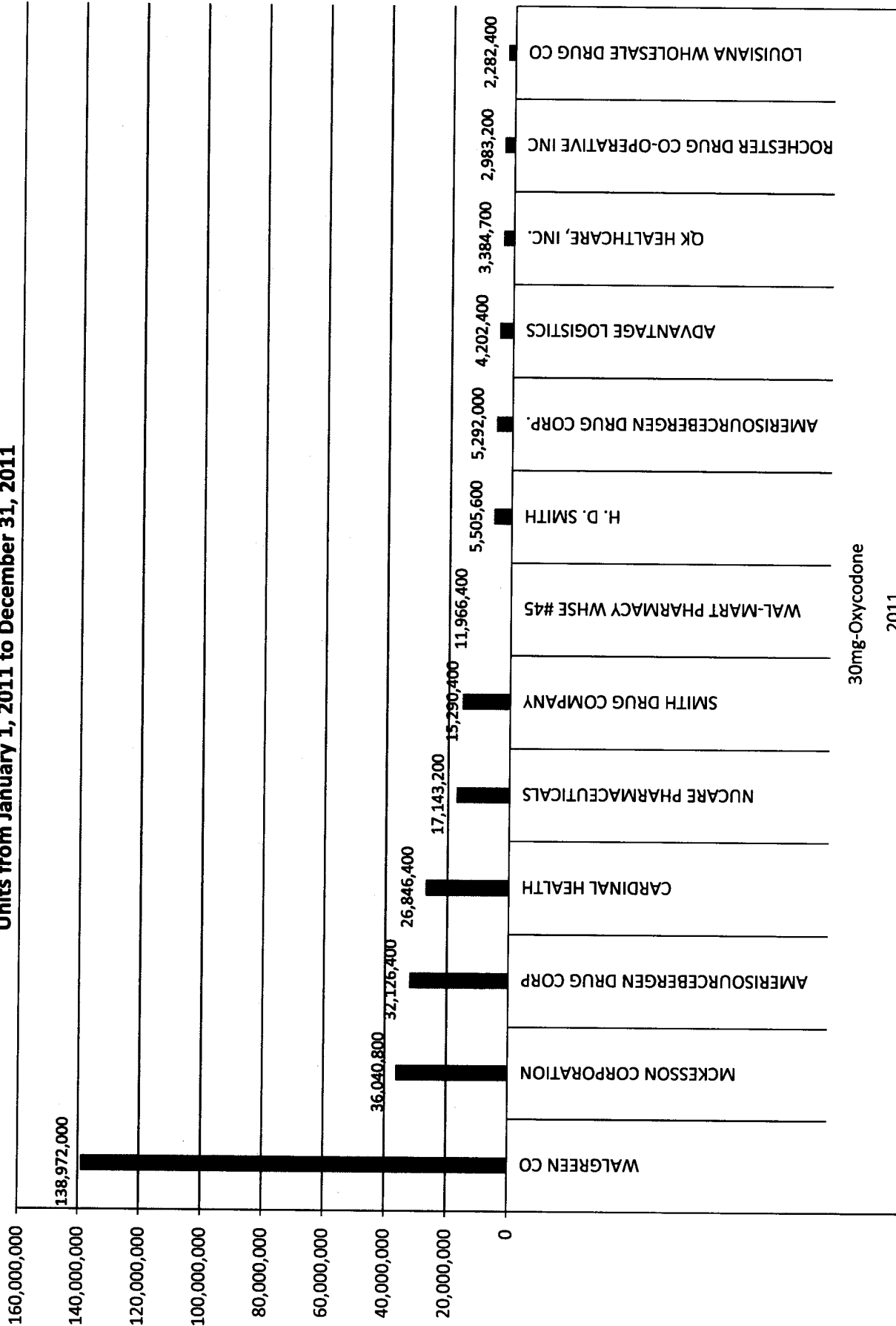
15mg-Oxycodone  
 2011

**UPS Supply Chain Solutions, Inc. (RU0346088) KY Sales in Dosage Units from January 1, 2010 to December 31, 2010**



30mg-Oxycodone  
2010

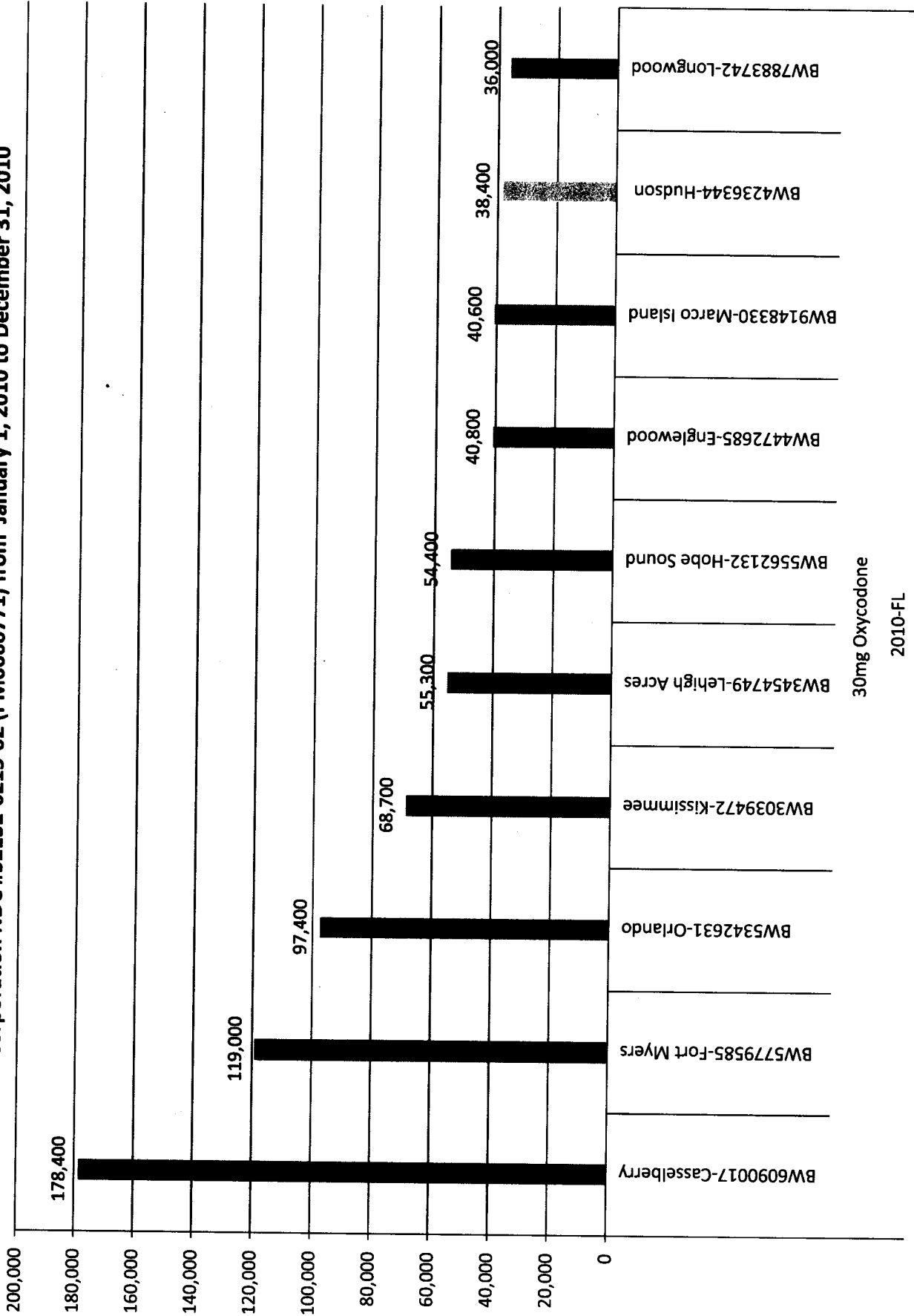
**UPS Supply Chain Solution, Inc. (RU0346088) KY Sales in Dosage  
Units from January 1, 2011 to December 31, 2011**



30mg-Oxycodone

2011

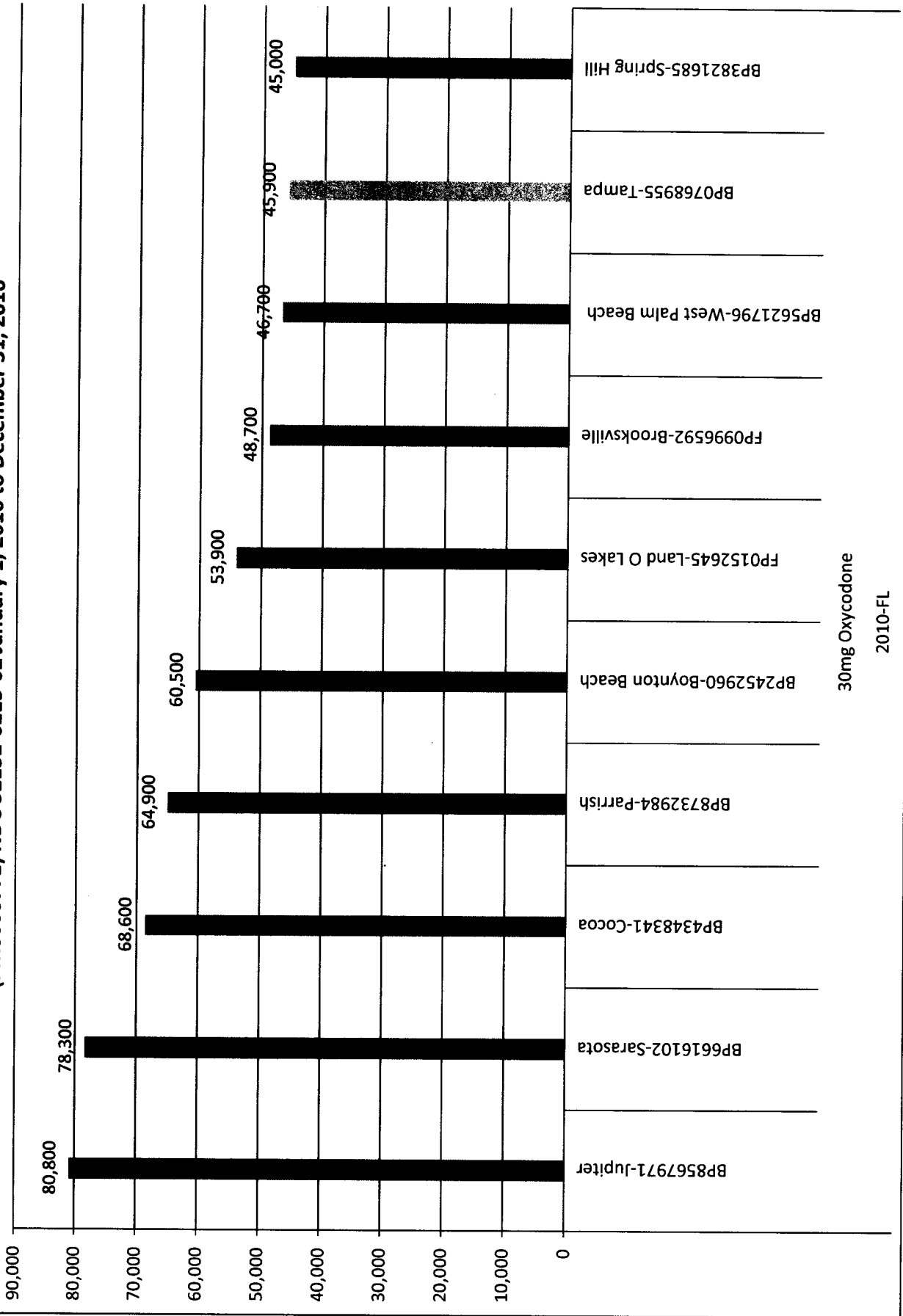
Winn-Dixie Stores Purchases in Dosage Units of Actavis Oxycodone 30mg Tablets from McKesson Corporation NDC #52152-0215-02 (PM0000771) from January 1, 2010 to December 31, 2010



30mg Oxycodone  
2010-FL

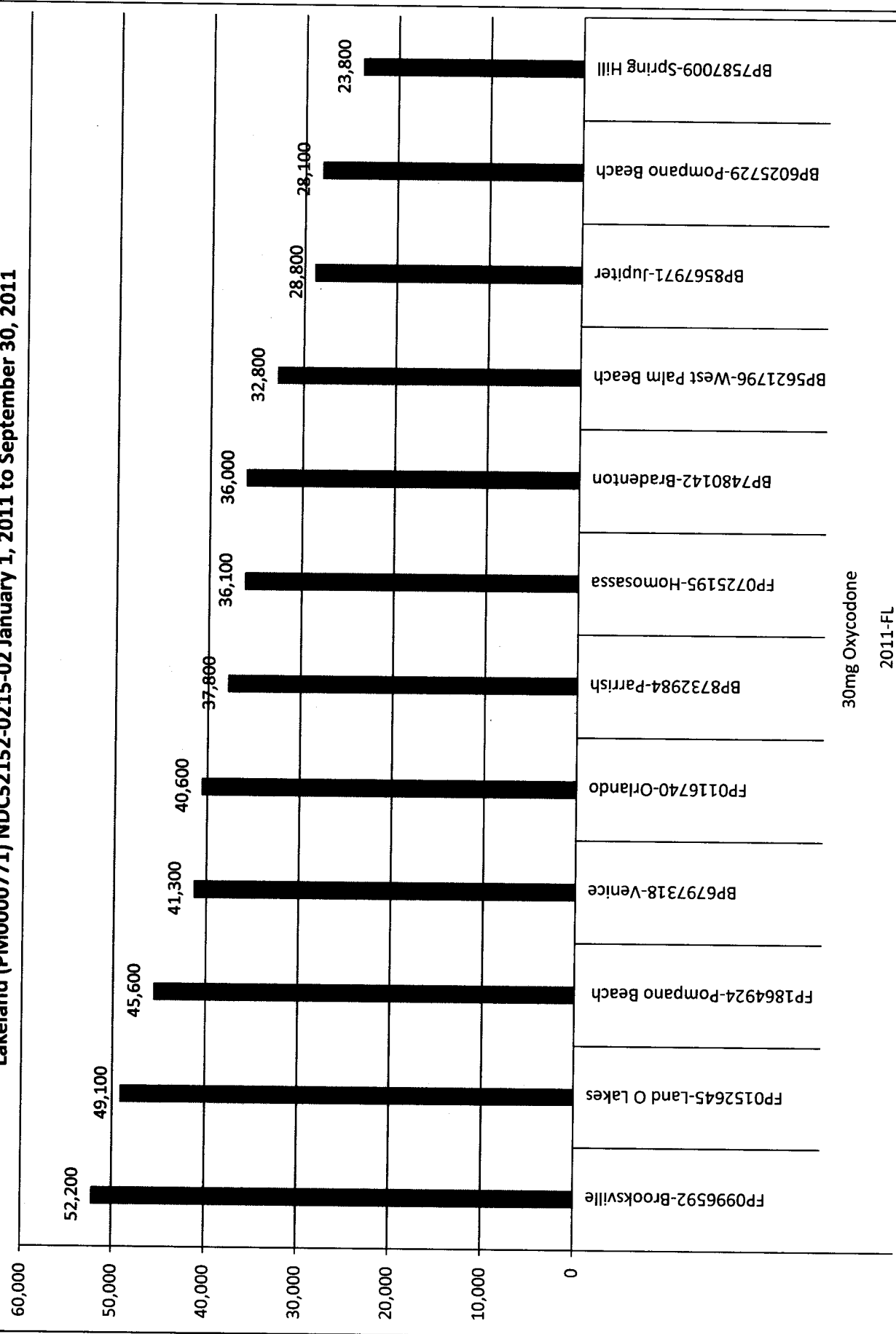


**Publix Stores Purchases in Dosage Units from McKesson Corporation Lakeland  
(PM0000771) NDC 52152-0215-02 January 1, 2010 to December 31, 2010**



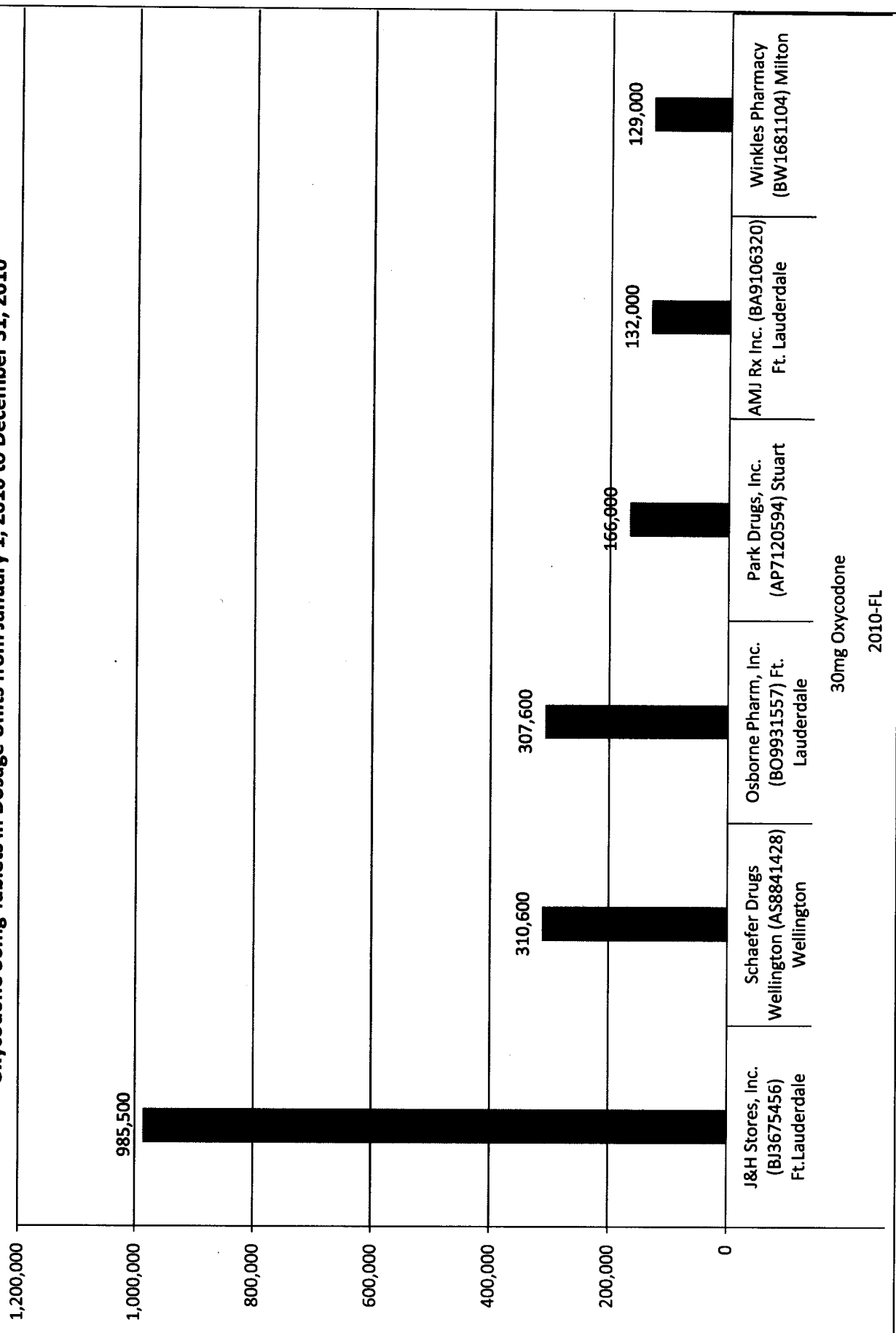
30mg Oxycodone  
2010-FL

**Publix Super Markets Purchases in Dosage Units from McKesson Corporation  
Lakeland (PM0000771) NDC52152-0215-02 January 1, 2011 to September 30, 2011**



30mg Oxycodone  
2011-FL

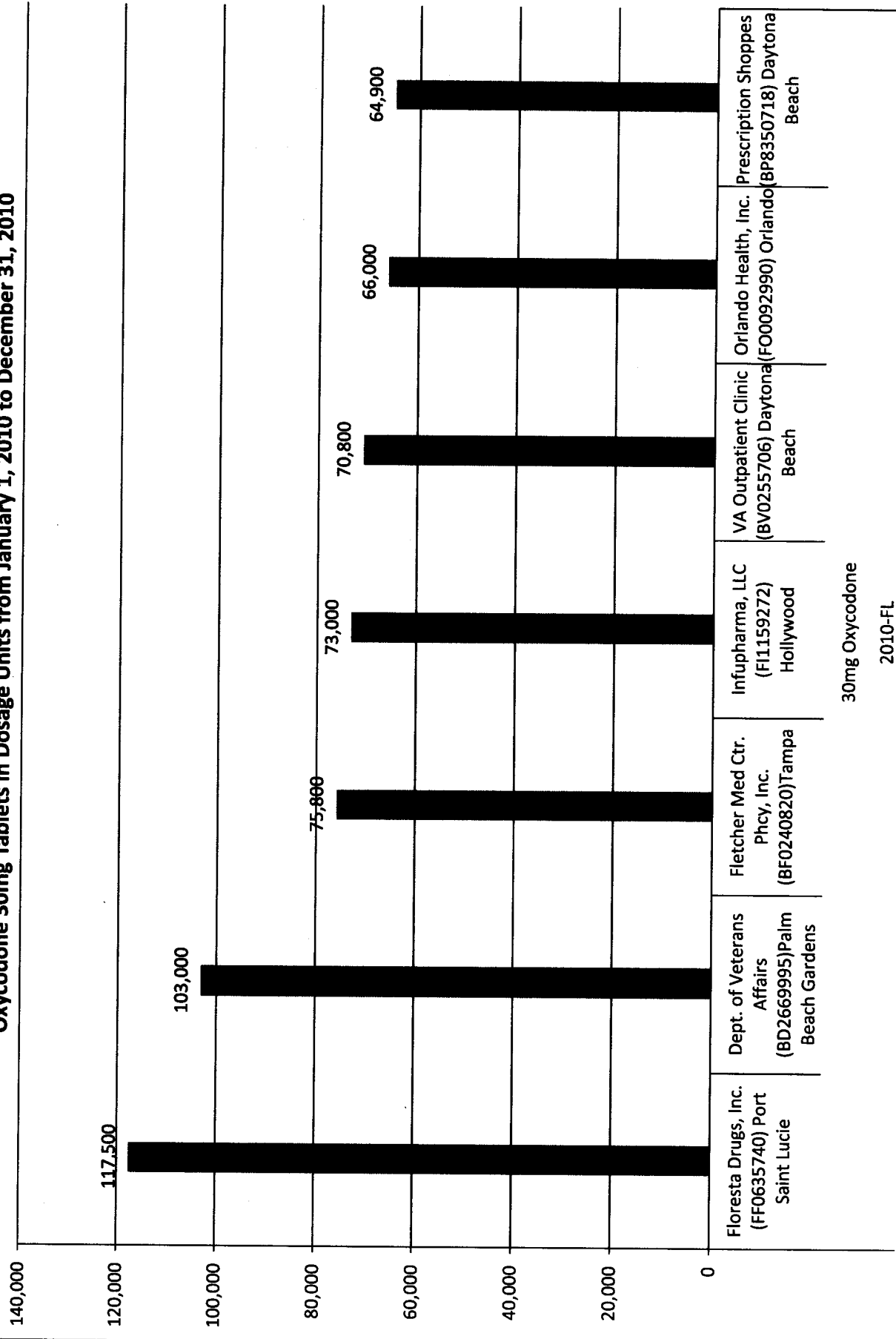
**McKesson Corporation Lakeland (PM0000771) NDC #52152-0215-02 Sales of Actavis Oxycodone 30mg Tablets in Dosage Units from January 1, 2010 to December 31, 2010**



30mg Oxycodone

2010-FL

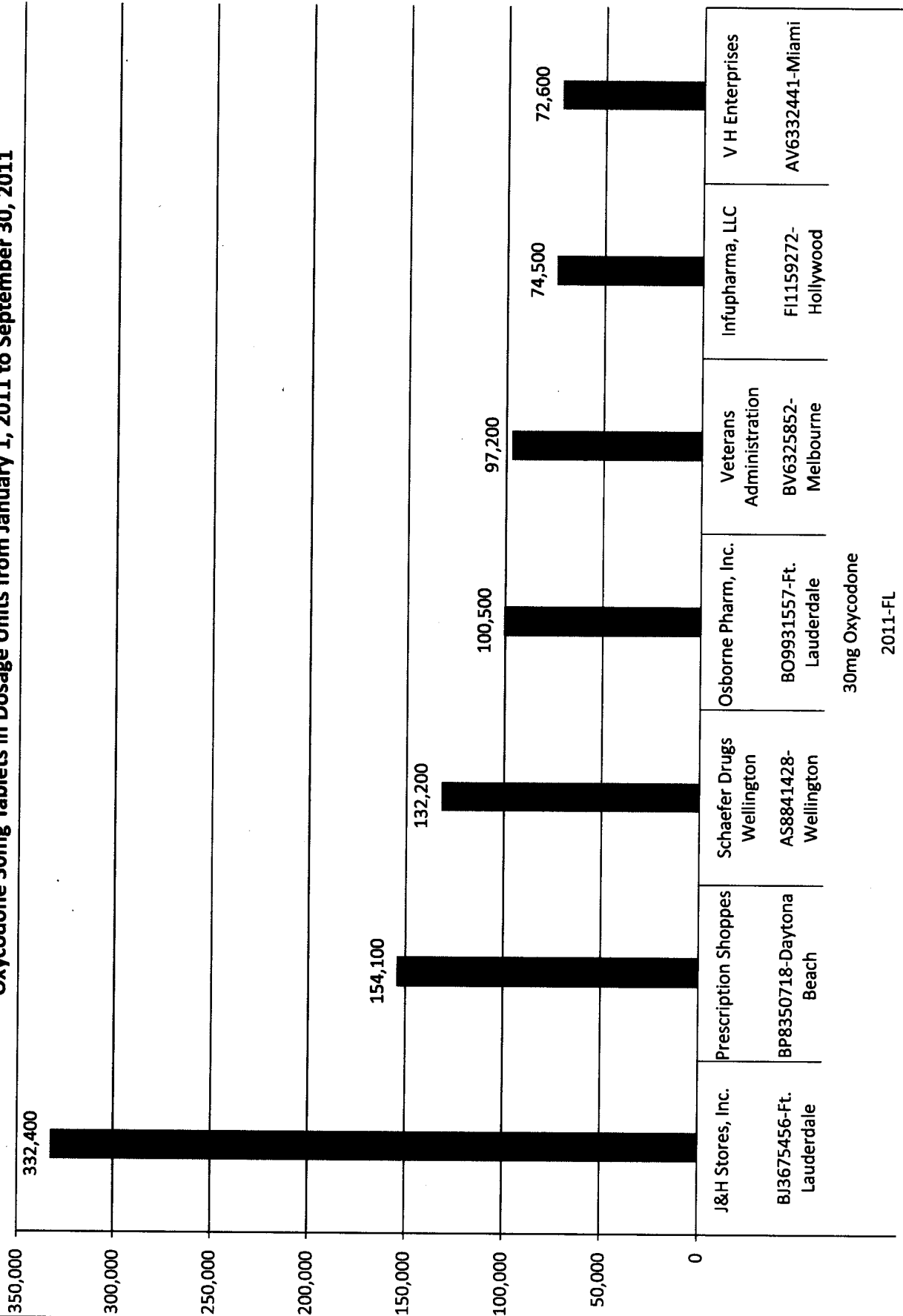
**McKesson Corporation (Lakeland) PM0000771 NDC# 52152-0215-02 Sales of Actavis  
Oxycodone 30mg Tablets in Dosage Units from January 1, 2010 to December 31, 2010**



30mg Oxycodone

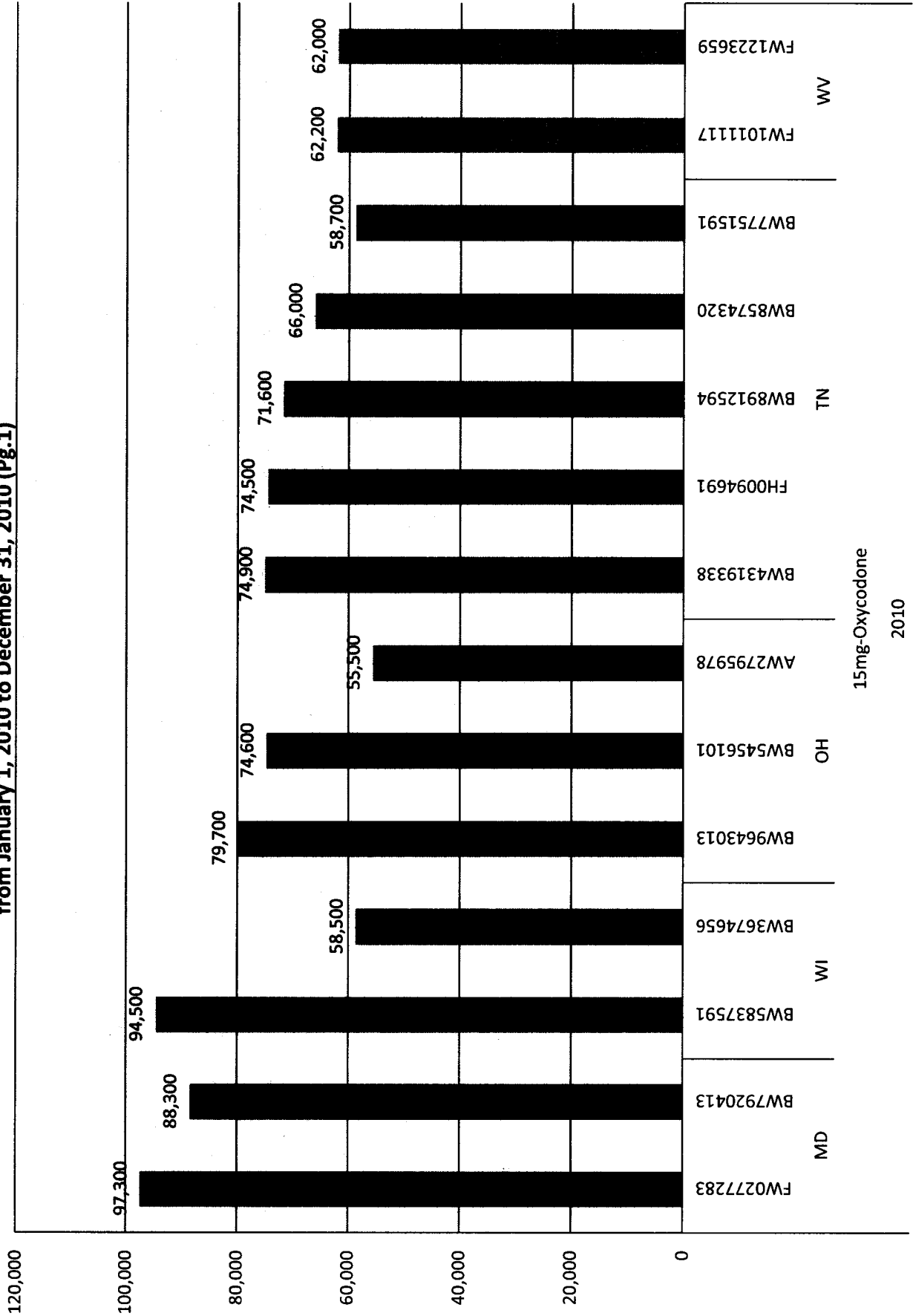
2010-FL

**McKesson Corporation Lakeland (PM0000771) NDC52152-0215-02 Sales of Actavis  
Oxycodone 30mg Tablets in Dosage Units from January 1, 2011 to September 30, 2011**

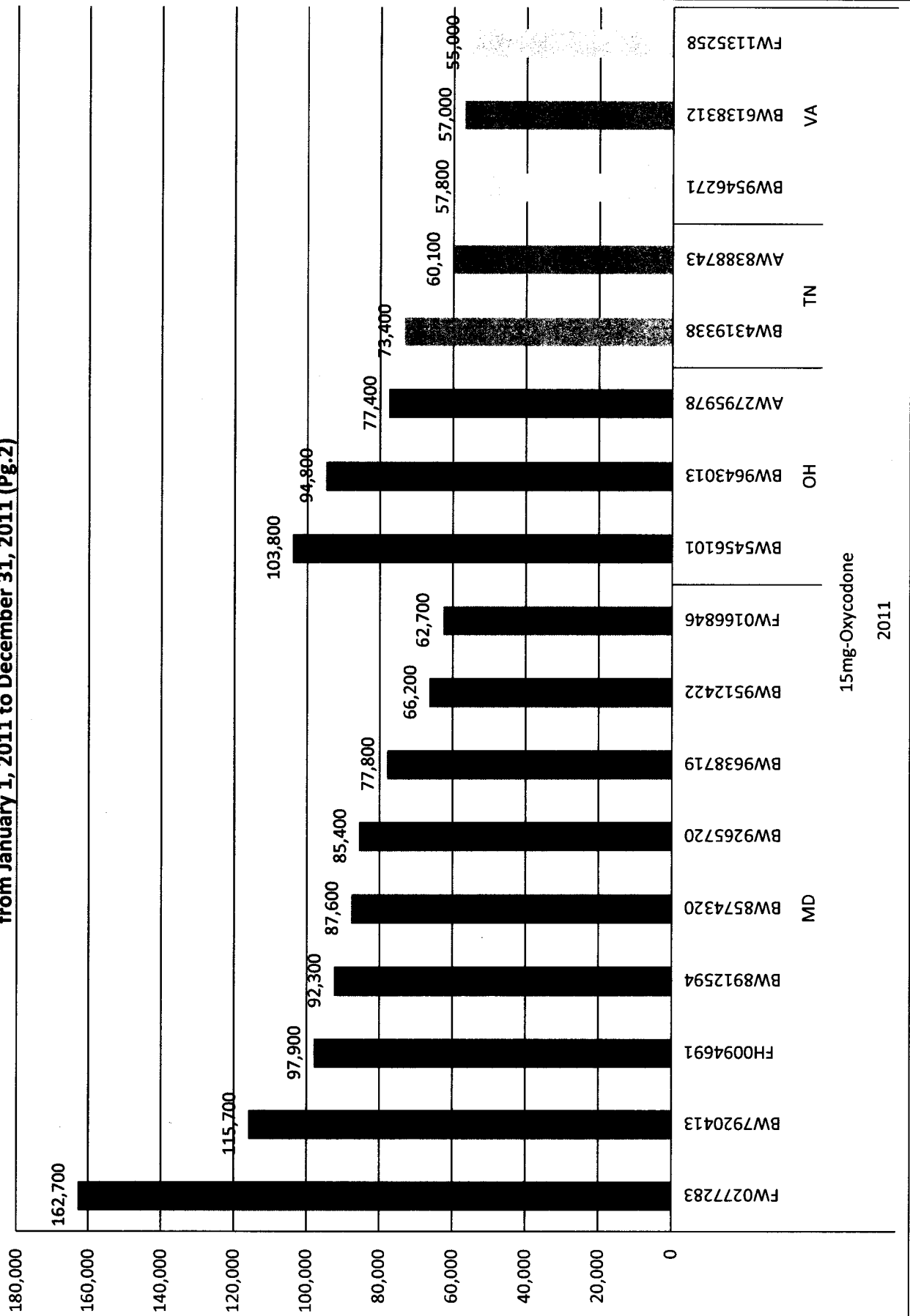


30mg Oxycodone  
2011-FL

Walgreen Co. (RW0294493) OH Sales in Dosage Units  
 from January 1, 2010 to December 31, 2010 (Pg.1)

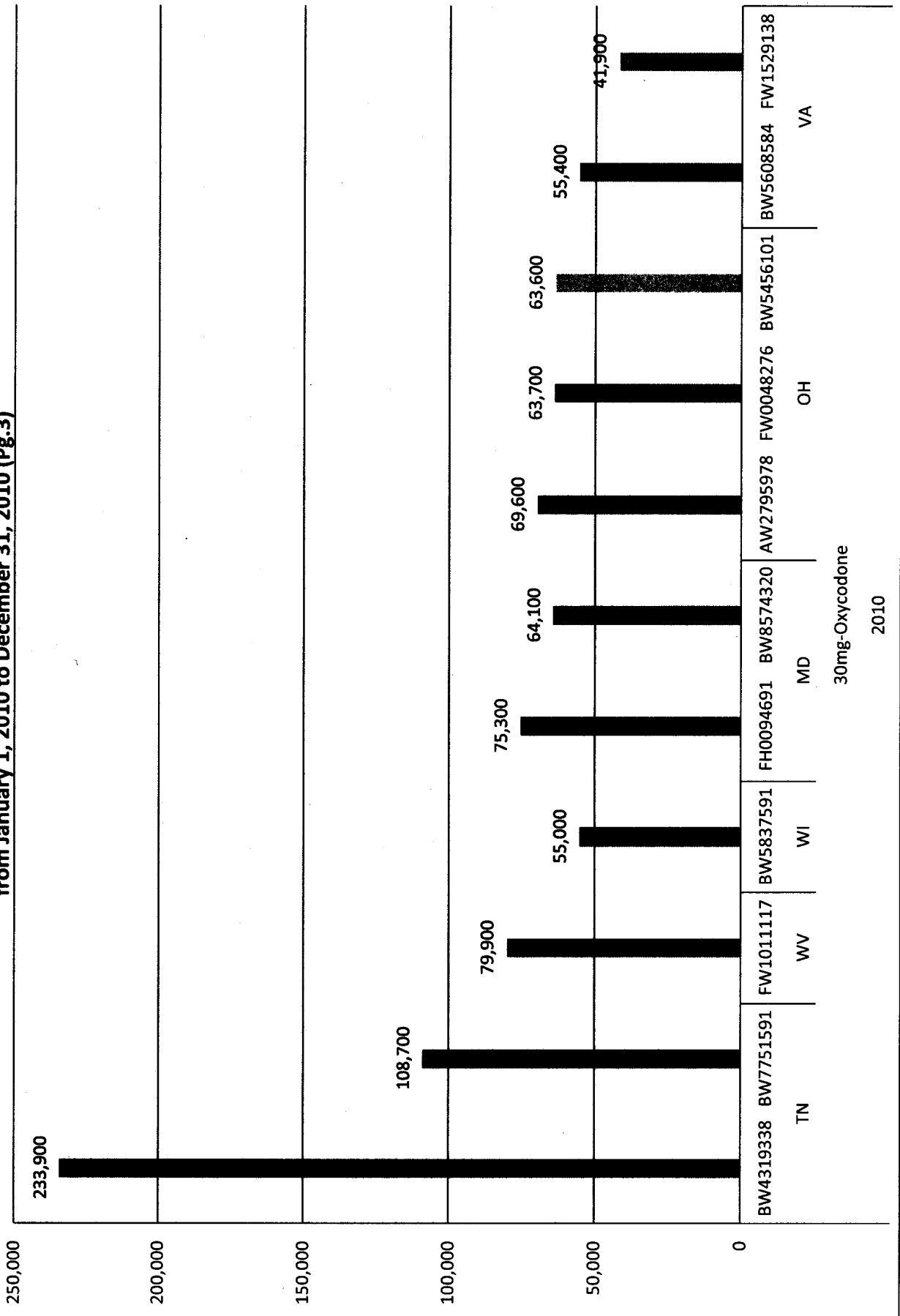


Walgreen Co. (RW0294493) OH Sales in Dosage Units  
 from January 1, 2011 to December 31, 2011 (Pg.2)



15mg-Oxycodone  
 2011

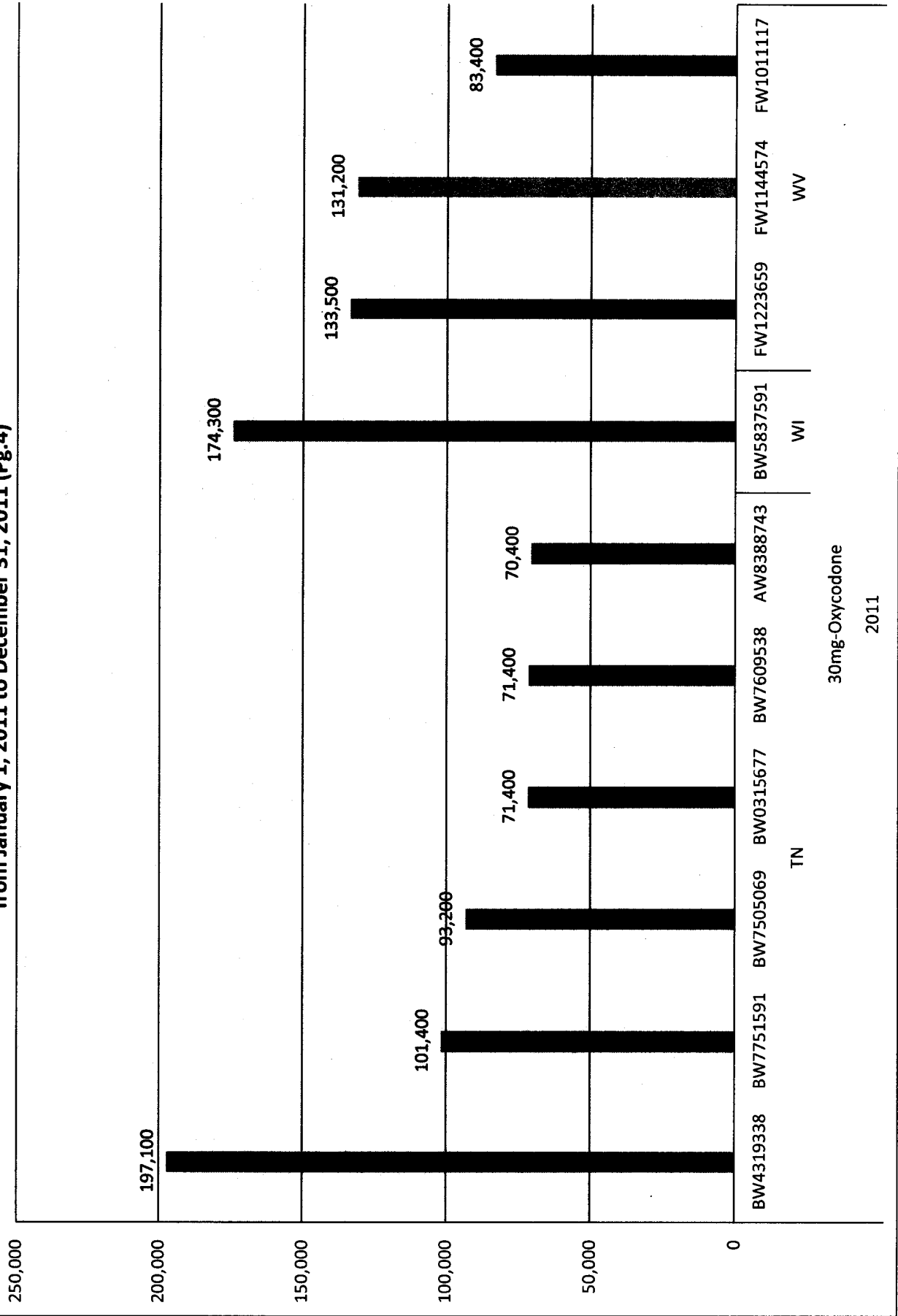
Walgreen Co. (RW0294493) OH Sales in Dosage Units  
 from January 1, 2010 to December 31, 2010 (Pg.3)



30mg-Oxycodone  
 2010

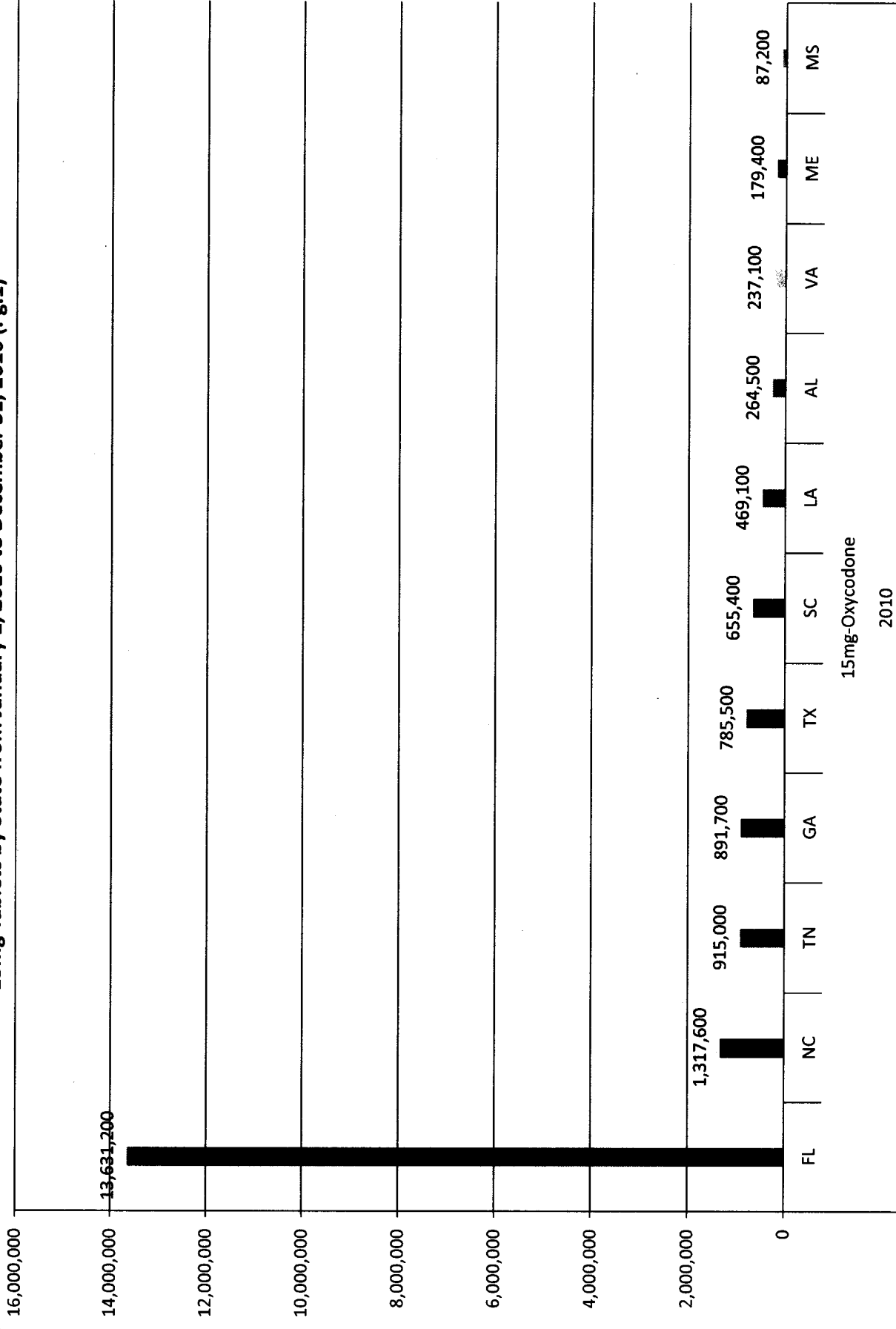


Walgreen Co. (RW0294493) OH Sales in Dosage Units  
 from January 1, 2011 to December 31, 2011 (Pg.4)



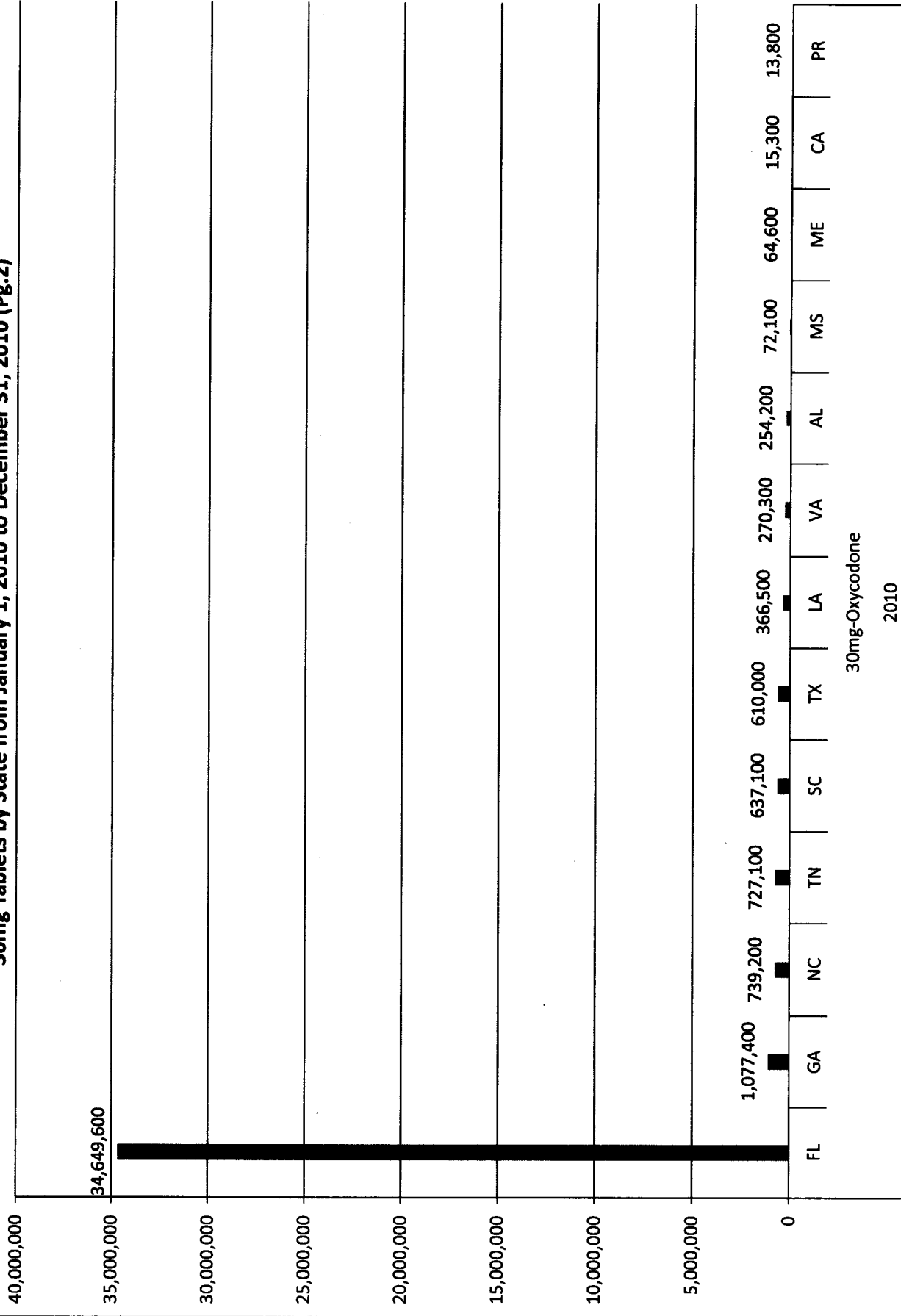
30mg-Oxycodone  
 2011

**Walgreen Co. (RW0277752) FL Sales in Dosage Units of Actavis Oxycodone  
15mg Tablets by State from January 1, 2010 to December 31, 2010 (Pg.1)**



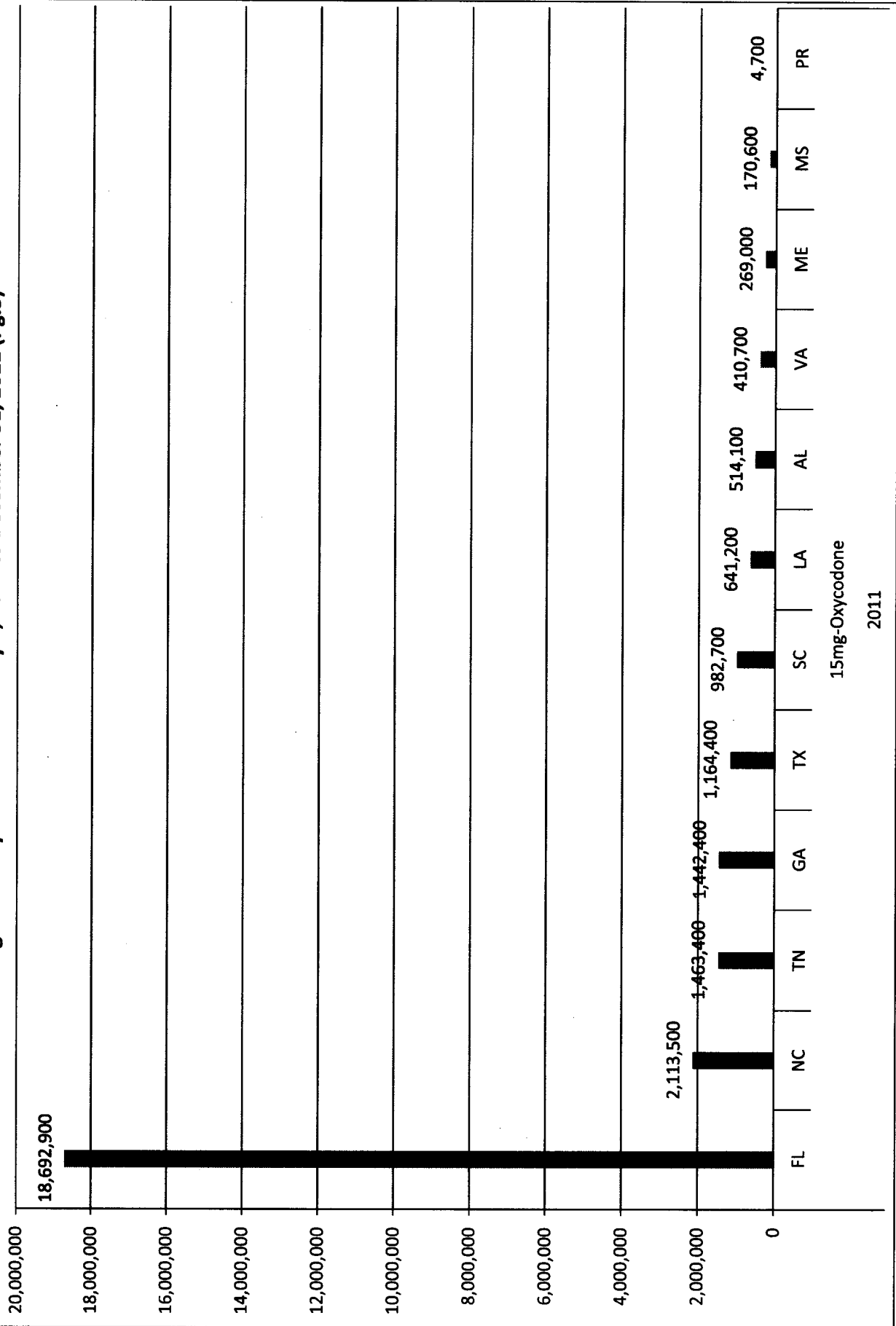
15mg-Oxycodone  
2010

**Walgreen Co. (RW0277752) FL Sales in Dosage Units of Actavis Oxycodone  
30mg Tablets by State from January 1, 2010 to December 31, 2010 (Pg.2)**



30mg-Oxycodone  
2010

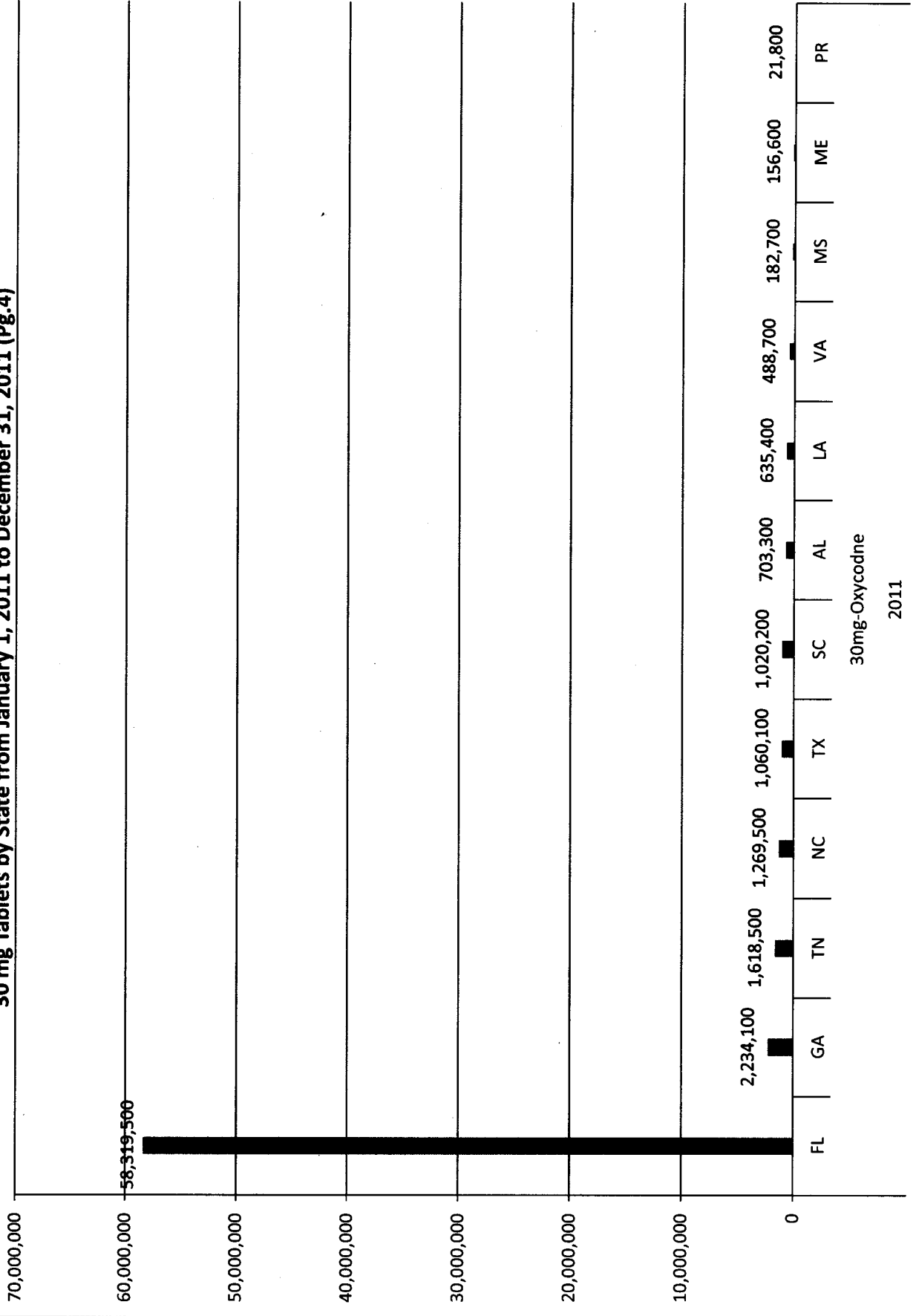
**Walgreen Co. (RW0277752) FL Sales in Dosage Units of Actavis Oxycodone  
15mg Tablets by State from January 1, 2011 to December 31, 2011 (Pg.3)**



15mg-Oxycodone

2011

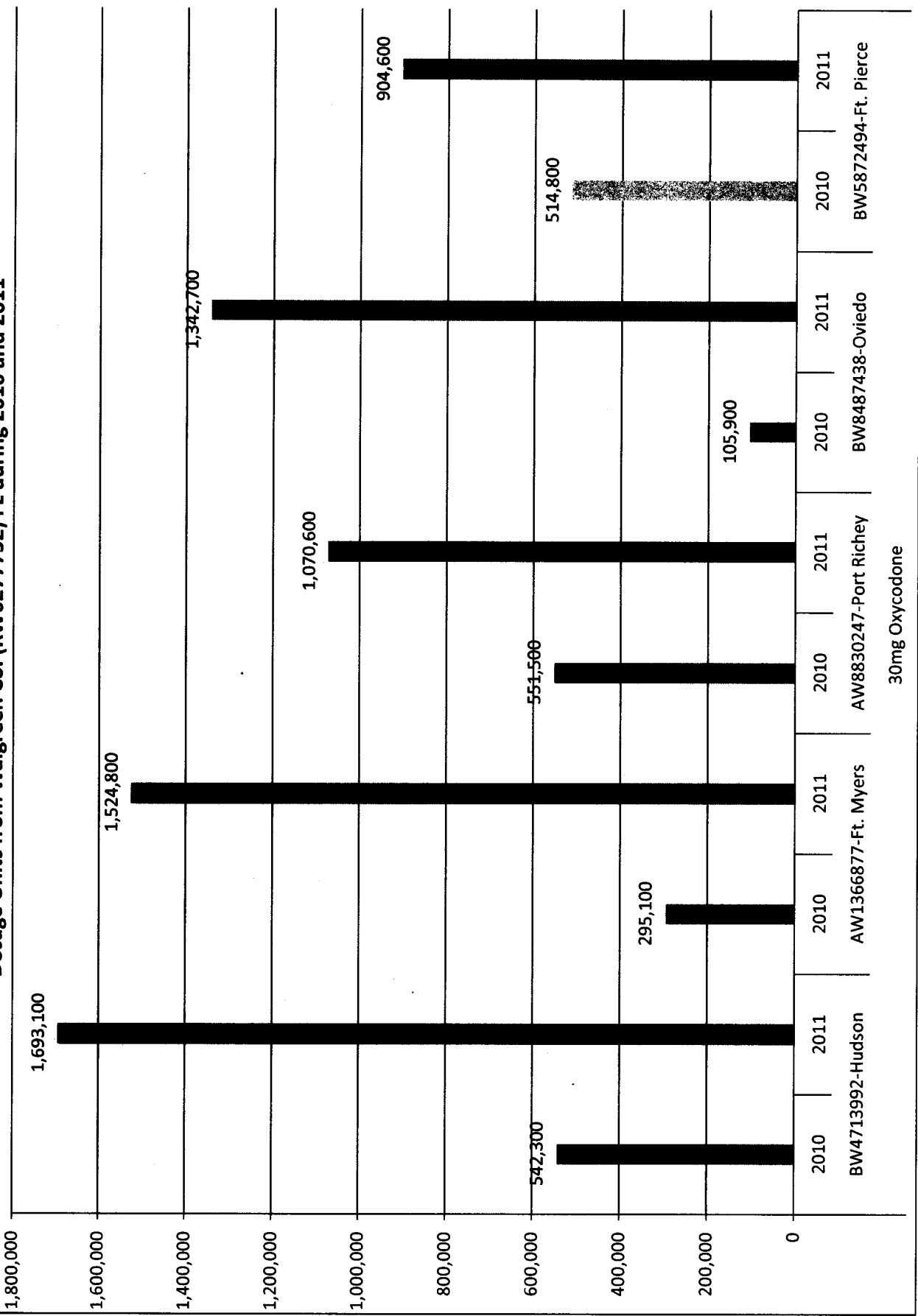
**Walgreen Co. (RW0277752) FL Sales in Dosage Units of Actavis Oxycodone  
30 mg Tablets by State from January 1, 2011 to December 31, 2011 (Pg.4)**



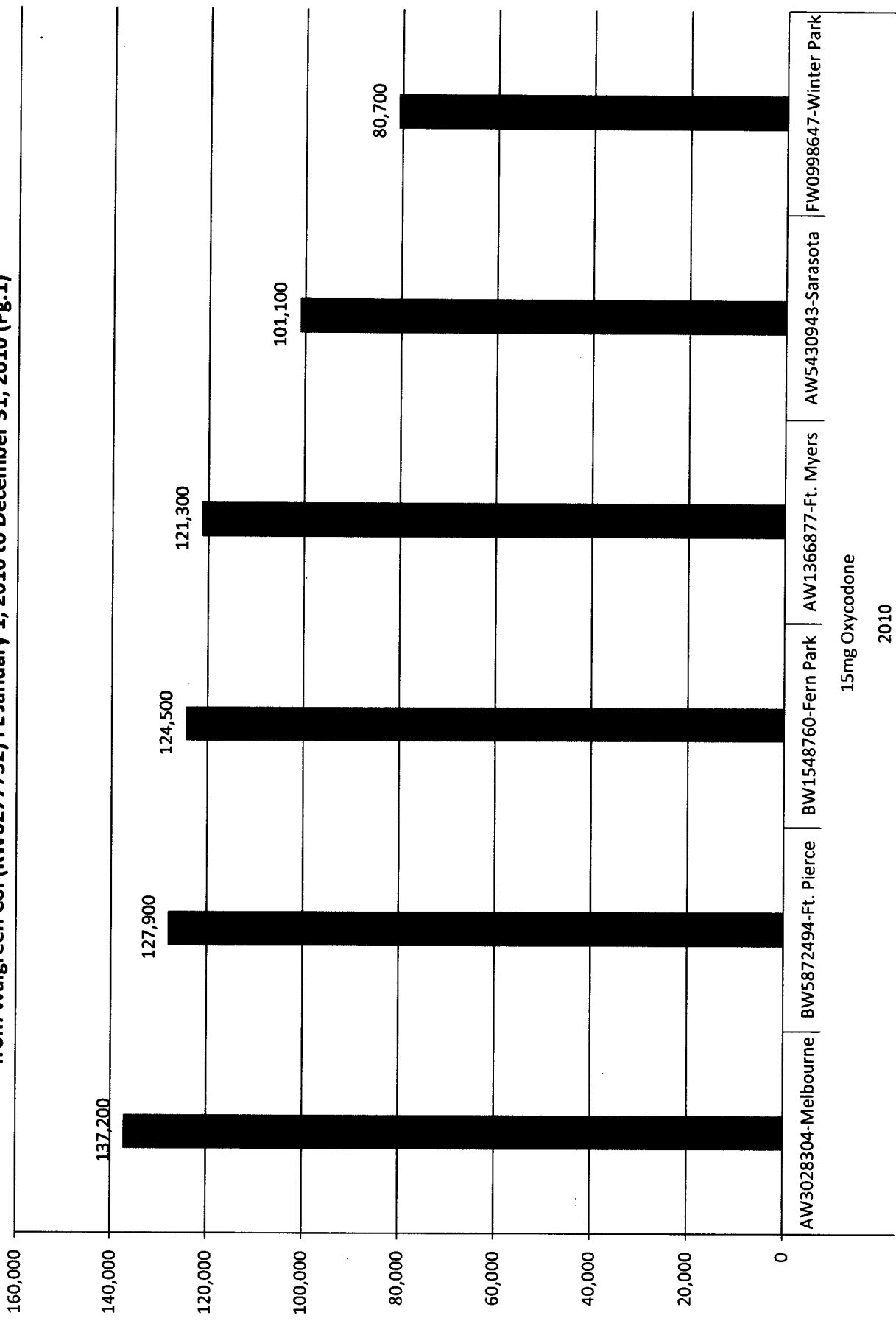
30mg-Oxycodone

2011

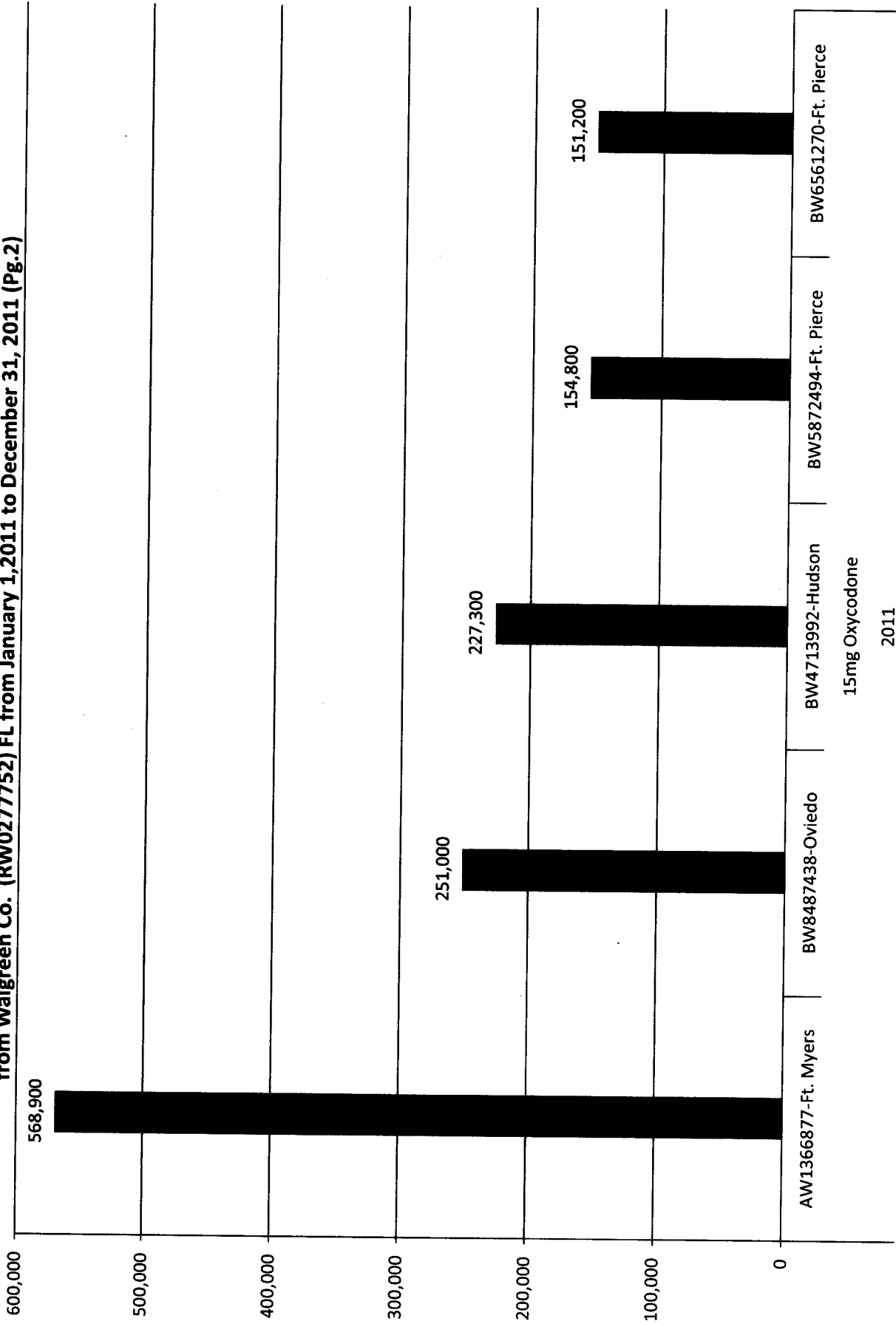
**Walgreen Pharmacies Purchases of Actavis Oxycodone 30mg Tablets in Dosage Units from Walgreen Co. (RW027752) FL during 2010 and 2011**



**Walgreen Pharmacies Purchases of Actavis Oxycodone 15mg Tablets in Dosage Units  
from Walgreen Co. (RW027752) FL January 1, 2010 to December 31, 2010 (Pg.1)**



**Walgreen Pharmacies Purchases of Actavis Oxycodone 15mg Tablets in Dosage Units  
from Walgreen Co. (RW0277752) FL from January 1, 2011 to December 31, 2011 (Pg.2)**

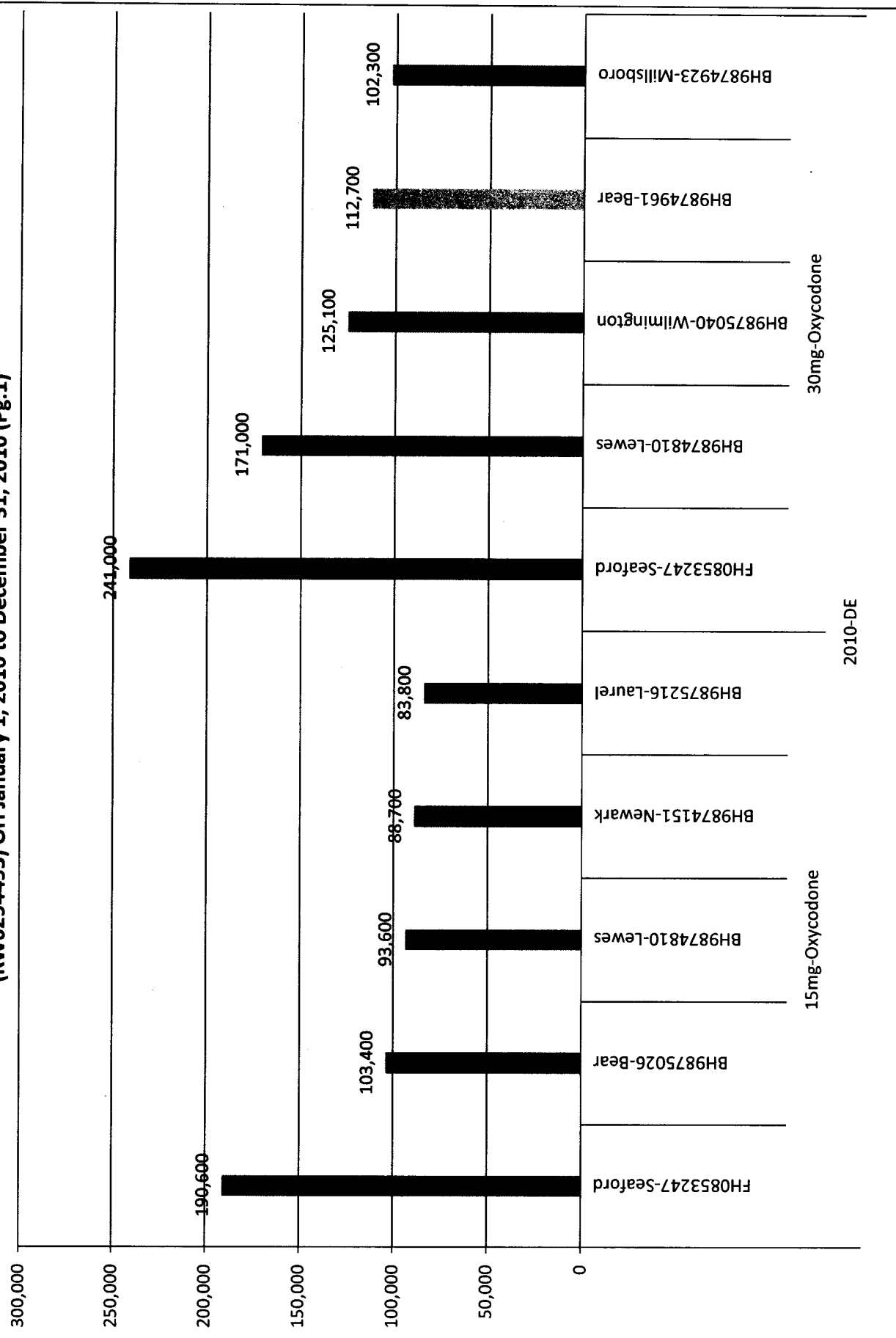


15mg Oxycodone

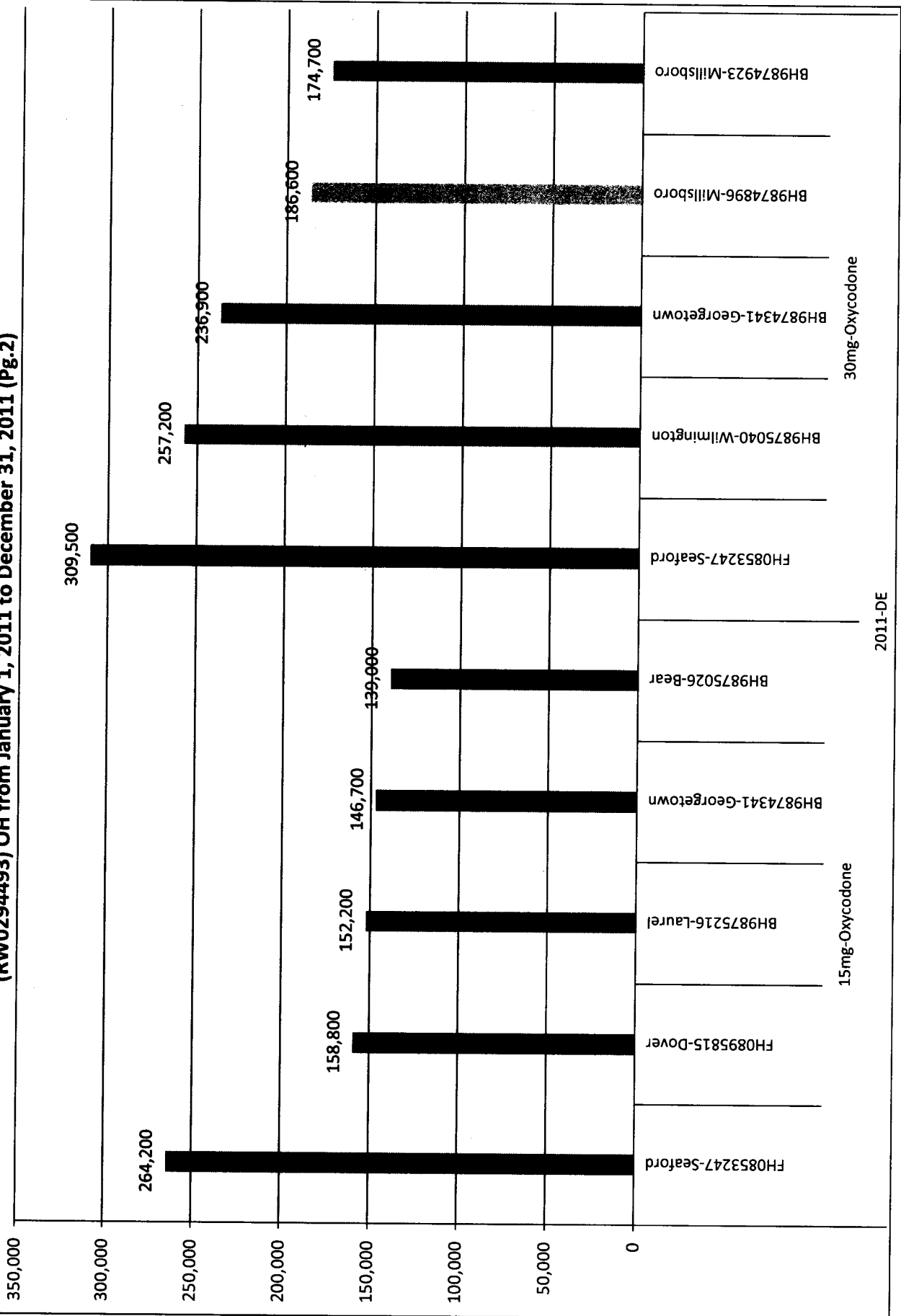
2011



Happy Harry's Inc. Purchases in Dosage Units from Walgreen Co.  
 (RW0294493) OH January 1, 2010 to December 31, 2010 (Pg.1)



Happy Harry's Inc. Purchases in Dosage Units from Walgreens Co.  
 (RW0294493) OH from January 1, 2011 to December 31, 2011 (Pg.2)



## Suggested Questions a Distributor should ask prior to shipping controlled substances.

This list of questions is not intended to be all inclusive nor should it be interpreted that every situation or registrant activity is covered. This questionnaire is provided to assist the distributor to formulate a better understanding of who their customers are and whether or not they should sell to them controlled substances. It is incumbent upon you, the distributors, to ensure that sales to your customers are for legitimate purposes. It is further incumbent upon you to identify illicit or suspicious activities which may result in the diversion of controlled substances.

The use of this questionnaire should not be construed in any manner to be a mechanism or means that you have fully met the criteria and actions required by 21 USC 823 or other state and federal laws that are applicable.

### Possible questions for a pharmacy:

- Does the pharmacy fill prescriptions via the Internet? If so, is the pharmacy registered with the DEA under the Ryan Haight Act?
- Is this a mail order pharmacy (fills prescriptions for insurance, etc.)?  
**Note:** A pharmacist may claim to be mail order pharmacy but may actually be operating as an Internet pharmacy. Do not accept the response to this question at face value.
- Is the pharmacy licensed in all states for which it mails or fills prescriptions?
- Does the pharmacy report to all states that have prescription monitoring programs in which their customers reside and to whom they dispense?
- Does the pharmacy provide services for any specialty customers such as Long Term Health Care, Hospice Centers, Assisted Care Living Facilities, etc.?
- Does the pharmacy have staff or a private firm that solicits practitioners to get more business?
- What is the pharmacy's ratio of controlled vs. non-controlled orders?
- Does the pharmacy order a full variety of controlled substances and are they fairly evenly dispersed? If not, why the disparity?
- What are the hours of operation of the pharmacy?
- Does the pharmacy offer a full assortment of sundries to its customers (e.g., aspirin, snacks, cosmetics, etc.)?
- Does the pharmacy have security guards on the premises? If so, why?
- What methods of payment does the pharmacy accept (cash, insurance, Medicaid, and in what ratios)?
- Who is the pharmacy's primary supplier?
- Does the pharmacy order from other suppliers as well? If so, why and what controlled substances?
- If this is a new account, why does the pharmacy want you to be their supplier?

- If you are not the only supplier, what controlled substances will the pharmacy be ordering from you, in what quantities, in what time frame, and will they be ordering these same products from other suppliers?
- What ratio will you be supplying compared to other suppliers?
- Does the pharmacy fill prescriptions for out of state customers? If so, for how many out of state customers does the pharmacy fill (ratio or approximate number)?
- If the pharmacy fills prescriptions for Pain Management or other specialty practitioners (diet, oncology, etc.), is the pharmacist comfortable with the prescribing practices of the practitioner?
- Has the pharmacist questioned or been uncomfortable with, the prescribing practices of any practitioner?
- Has the pharmacy ever refused to fill prescriptions for a practitioner? If so, why and who?
- Are there particular practitioners who constitute most of the prescriptions it fills? Who are these practitioners (Name and DEA registration number)?
- Does the pharmacy have any exclusive contracts, agreements, arrangements, etc., with any particular practitioner, business group, investors, etc.? If so, explain those arrangements and/or obtain copies of those agreements.
- Is the pharmacist comfortable enough with the prescribing practices of any or all practitioners for which they fill, to stake their professional livelihood on it?
- Does the pharmacy supply, order for, or sell to any practitioners or other pharmacies?
- How does the pharmacy sell/transfer controlled substances to other pharmacies or practitioners? Via a prescription, sales invoice, or DEA Form-222? (Transfer by prescriptions is not authorized).

Possible questions for a practitioner:

- What is the practitioner's specialty, if any (family practice, oncology, geriatrics, pain management, etc.)?
- Do the controlled substances being ordered correspond to his specialty or the treatment he provides?
- What method of payment does the practitioner accept (cash, insurance, Medicare) and what is the ratio of each?
- Has the practitioner ever been disciplined by any state or federal authority?
- How many patients does the practitioner see each day? What is his weekly average?
- Does the practitioner prescribe as well as dispense?
- Why does the practitioner prefer to dispense as opposed to prescribe?
- Who was the practitioner's previous supplier? Are they still ordering from this supplier? If not, why are they looking for a new supplier?
- Do the hours of operation and the facility accommodate the type of practice being conducted?
- Does the practitioner's office have security guards on-site? If so, why?

- Are all applicable state, federal, local licenses current and are they issued for the registered address at which the practitioner is practicing?
- Does the practitioner see out of state patients? If so,
  - From what states,
  - How many,
  - Approximate ratio of out of state compared to local, and
  - Why, specifically, they travel so far to see him?
- Can the practitioner provide a blank copy of an agreement which they enter into with a patient, specifying the course of treatment, the patient rights and responsibilities, and reasons for termination of treatment?
- Does the practitioner conduct random unannounced drug testing?
- What measures does the practitioner employ and/or monitor to prevent addiction and diversion of controlled substances?
- Are there more than one practitioner dispensing controlled substances from the registered location?
- Do you order for just yourself or for the whole clinic?
- What controlled substances are you currently dispensing? (If only one or two controlled substances are being ordered, have the practitioner fully explain why he administers or dispenses only these specific controlled substances).
- In what dosage levels is the practitioner dispensing (2 tablets, 4 times a day, for 30 days, or 90, 120, 240 a week, month).
- Does the practitioner prescribe as well as dispense to his patients?
- Does the practitioner prescribe the same controlled substances as were dispensed to the patient?
- How many patients is the practitioner presently treating (day, week, and month)?

Should you have any additional questions, concerns, or issues beyond what has been presented; it is strongly recommended you contact your local DEA Office.