U. S. Department of Justice
Drug Enforcement Administration
Miami Field Division
2100 North Commerce Parkway
Weston, Florida 33326

NOV 18 2011

CERTIFIED MAIL

Albert Paonessa III, Executive Vice President
Anda
2915 Weston Road
Weston, Florida 33331

Re: DEA Registration Number RA0180733

Dear Mr. Paonessa:

Investigators of the Miami Field Division, Drug Enforcement Administration, conducted an investigation of Anda during July 2010. Please accept DEA's apology for the delay in sending this correspondence informing you of the results of that investigation. The investigation revealed the following violations of the Controlled Substances Act of 1970 and the regulations promulgated thereunder:

1. Failure to maintain a complete and accurate record of all controlled substances on hand on the date the inventory is taken. Officials at Anda provided investigators with a DEA biennial inventory taken at the start of the day on January 4, 2010. This biennial inventory contained two entries reflecting 963 bottles, each containing 100 tablets, for Endocet 10/325mg. Anda officials informed the investigators that one of the entries was a duplicate and should not be listed on the inventory as it was not included on the firm's ARCOS report for the year ending 2009. Requirements for inventories are outlined in Title 21, Code of Federal Regulations, Section 1304.11. Failure to comply with these regulations is in violation of Title 21, United States Code, Section 842(a)(5).

2. Failure to report to DEA suspicious orders for controlled substances as required by Title 21, Code of Federal Regulations, Section 1301.74, in violation of Title 21, United States Code, Section 842(a)(5). Prior to DEA's onsite investigation at Anda during July 2010, DEA met with the firm during 2005 and 2007 to discuss Anda's pattern of distribution of significant quantities of controlled substances to its customers. During the 2007 meeting, Anda stated that prior to 2007, the firm was unable to identify when customers ordered large quantities of product from the same chemical family.

   A DEA Report of Investigation (2008) documents a statement by an Anda official that customers are limited to purchasing no more than 5,000 dosage units per month in certain chemical families.

Analysis of Anda's distributions of oxycodone during 2009 and 2010, reveal substantially significant sales to numerous customers which consistently met and exceeded 5,000 dosage units per month.

This letter is formal notification that your firm is in violation of the Controlled Substances Act of 1970 and the regulations promulgated thereunder. At this time, you are being afforded the opportunity to voluntarily comply with the regulations which were discussed with you by the Investigators.

Please respond in writing, within fifteen (15) days of receipt of this letter, advising of the corrective action taken or planned and the estimated completion date.

Inquiries regarding this matter should be directed to Diversion Group Supervisor Gayle W. Lane at (954) 306-4650.

Sincerely,

Mark R. Trouville
Special Agent in Charge

By: GLane AOR
Barbara A. McGrath
Diversion Program Manager