From:Albert Paonessa [/o=mail/ou=exchange administrative group (fydibohf23spdlt)/cn=recipients/cn=apaonessa3]Sent:3/7/2013 10:53:37 PMTo:Robert A Stewart [/o=mail/ou=exchange administrative group (fydibohf23spdlt)/cn=recipients/cn=rstewart1]CC:Albert Paonessa [/o=mail/ou=exchange administrative group (fydibohf23spdlt)/cn=recipients/cn=apaonessa3]Subject:Contingency and SOMAttachments:image003.png

Bob,

Follow up to our conversation earlier on the new Suspicious Order Monitoring program and a contingency program if we lose our licenses.

- 1. Suspicious Order Monitoring (SOM)
 - a. Program "can" be live next week
 - b. Program design
 - i. Customer can order online or by phone unlimited amounts of controls (We need to make the new amount UNLIMITED or we will not get any suspicious orders)
 - 1. All orders over the set chemical limit will be flagged and reviewed by the compliance department.
 - 2. Orders that are slightly over the limit will be reviewed and our normal due diligence policies with the customer will be followed.
 - 3. Orders that we deem excessive or suspicious (ie-customers limit and/or monthly average is 10,000 hydrocodone's and an order is placed for 25,000 or more tablets)
 - a. We remove the customer from having the ability to buy controls
 - b. And, report the customer and the order to the DEA
 - c. (Although this is what we feel the DEA wants, I so disagree with this method as we are now almost enticing the customer to buy as much as he wants and then turning them into the DEA.)
- 2. Contingency Plan
 - a. We have two possible scenarios
 - i. Lose OH/MS license
 - ii. Lose OH/MS and they will not renew Florida
 - b. Contingency plans
 - i. Lose OH/MS
 - 1. Move C2"s to Gurnee and pull on a daily basis to Florida
 - 2. Limit orders out of Florida to Rite Aid Adderall, retail independents, and Publix
 - 3. All 3 through 5's can be handled in Florida for all accounts, no financial impact.
 - ii. Lose OH/MS and they do not renew FL on June 30.
 - 1. Return product to vendors
 - 2. Gurnee can't operate as a 3PL for Anda as they do not have the ability to ship to all states and we would have to use their SAP system to process the orders
- 3. Mike PPT
 - a. Mike will update the PPT we did in Washington to include:
 - i. Additional stores we have either stopped selling to or would not open since we met in DC
 - ii. Add slides on the enhanced SOM modifications we have added.
- 4. Numbers YTD 2013





Adding to the contingency plans:

- 1. We'd like to reach out to UPS under a CDA to see if they can act as our 3PL. They do the fulfillment and we still get the sale.
 - a. We need to work quickly as it may take 6 months to complete something like this.
 - b. I'd only work with Bill Hook on this who is their VP of Global Healthcare

Thanks,

Al