
From: Noemi Rebeco
Sent: Monday, August 24, 2009 9:10 AM
To: Nancy Baran
Subject: RE: HELP please...Fw: Suspicious Orders

Hi Nancy:

I was on vacation last week and unfortunately we had a problem with the email that day and I couldn't leave a message to advise that I was out of the office.

Suspicious order report is checked daily by our "DEA Analyst" Omar Plaza as follow:

- We daily checked the suspicious order report
- We select customers that are exceeding the normal orders (over 25-50%)
- We chose the ones that should be investigated by Actavis customer service
- We get the reply from customer service advising the reason of the large Order (most of the time trade show or promotions)
- We sent to the local office once a month a copy of the "suspicious report" with the Customer service reply.

Noemi

-----Original Message-----

From: Nancy Baran
Sent: Monday, August 17, 2009 2:21 PM
To: Noemi Rebeco
Subject: FW: HELP please...Fw: Suspicious Orders

Noemi,

Pls provide input to the question from legal below...see my notes.

Tx

Nancy Baran

First part of this could be answered by the use of our DEA suspicious report- I would just need to ask Umesh to look at the specs of the report because I don't have my notes with me. In other words, orders are flagged as suspicious if they are -

A) first time purchases

B) exceed normal usage (would just need to see what the threshold is - ex: what percent over and based on what are orders considered suspicious) Umesh- can you tell this easily by looking at the code? Given the audience...I'd like to get it right.

Last part of the first question-



I know that Noemi's group has a role in monitoring DEA aspects, but can't speak to exactly what they do. Pat- how would you briefly describe what she or her group does?

Second part of this - I guess I could respond by saying something along the lines of how are system is set up to prevent shipping a controlled product without a valid DEA license.....which is a document governed by the DEA who determines the customers eligibility. Our customer master database is updated monthly by means of a download of their eligibility data. Without a valid DEA license, an order will fail at point of entry. Our system (MFG PRO) will generate a failure report for any order rejected for DEA purposes/lack of current license in our system. Our 3rd party logistic provider (UPS-SCS) has a level of security equally as secure as our systems acting as a secondary ckeckpoint. This makes it virtually impossible to sell to a customer that is not authorized to distribute controlled products.

Thanks,
Nancy

----- Original Message -----

From: John LaRocca
To: Nancy Baran; Michael Perfetto
Cc: Doug Boothe
Sent: Fri Aug 14 18:58:18 2009
Subject: Suspicious Orders

Nancy, Mike – do we have a written procedure in place to govern the handling of orders for Class II drugs that are out of line with previous experience from customers, from unknown customers, or are for unprecedented amounts? Also what is the procedure by which we get comfortable that our customers are registered and permitted to handle Class II's?

John LaRocca
Vice President/Chief Legal Officer

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