
From: Chaney, Katherine L. <Katherine.L.Chaney@usdoj.gov>
Sent: Tuesday, July 24, 2012 4:09 PM
To: Cochrane, Michael
Cc: Esteves, Alberto; Esteves, Alberto; Mitchell, Valerie D.; Geldhof, James; Walker, Robert; Cochrane, Patrick
Subject: RE: 2Record Request

Ok, thank you.

Kathy Chaney

From: Michael Cochrane [mailto:Michael.Cochrane@Andanet.com]
Sent: Tuesday, July 24, 2012 12:07 PM
To: Chaney, Katherine L.
Cc: Alberto Esteves; Alberto Esteves; Mitchell, Valerie D.; Geldhof, James; Walker, Robert; Patrick Cochrane
Subject: RE: 2Record Request

Ms. Chaney,

For clarification purposes, there have not been any instances where we have reported a specific order as being suspicious. However, based on our customer reviews, we have deemed numerous registrants as suspicious based on a review of specific data we have obtained or been provided and discontinued or denied the sale of controlled substances. While there have been no specific orders reported, we have reported numerous suspicious customers.

With regard to the sales to retired registrants Elite Pharmacy and Merced Medical Pharmacy, the sales should not have taken place. There appears to have been some delays in the appropriate retired registrant lists we purchase getting to the specific persons that conduct our database searches and retire them in our system appropriately.

Thank You
Michael Cochrane

From: Chaney, Katherine L. [mailto:Katherine.L.Chaney@usdoj.gov]
Sent: Tuesday, July 24, 2012 11:08 AM
To: Michael Cochrane
Cc: Alberto Esteves; Alberto Esteves; Mitchell, Valerie D.; Geldhof, James; Walker, Robert
Subject: RE: 2Record Request

Mr. Cochrane,

Can you clarify what you mean by "no individual specific suspicious orders"? Do you mean that ANDA has had no specific suspicious orders since 2007? If, in fact, ANDA identified suspicious orders after 2007, were those reported to DEA (other than through the customer cut-off lists) and if so, when and where?



One other item. We have not yet received a response from Mr. Esteves regarding DI Mitchell's request for information about the sales to Elite Pharmacy and Merced Medical Pharmacy. ANDA shipped controlled substances to these businesses after their DEA registrations had been retired.

Thanks for your cooperation.

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From: Michael Cochrane [<mailto:Michael.Cochrane@Andanet.com>]
Sent: Thursday, July 19, 2012 3:28 PM
To: Chaney, Katherine L.
Cc: Mitchell, Valerie D.; Geldhof, James; Walker, Robert; Patrick Cochrane; Alberto Esteves
Subject: RE: 2Record Request

No it does not. We do have a system for identifying orders of interest/suspicious orders based on the document you referenced below, SOP #040. However, there have not been any individual specific suspicious orders to report to you.

Below is a small summary regarding our decisions made pertaining to each of the applicable DEA registrants from your request. There are references to specific pages of information for each registrants due diligence package that help us reached our decision. I am also attaching information for Oakland Park Pharmacy. It was inadvertently left off of the flash drive provided with all of the other documentation.

Please let me know if there any additional questions or you would like to set up a conference call to discuss further.

Thank You
Michael Cochrane

FAMILY PHARMACY DEA #BA8739798 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 14 of data provided.

DUNAHOO DRUGS DEA #BD8518764 – Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 1 for Alprazolam, page 2 for Carisoprodol, page 3 for Endocet, page 4 for Hydrocodone, page 6 for Oxycodone and page 7 for Tramadol. Some states have now classified tramadol as a schedule IV controlled substance.

PRESCRIPTION PLACE/DEFUNIAK SPRINGS DEA BP9534327 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 3 for Alprazolam, page 10 for Carisoprodol, page 19 for Endocet, page 25 and 26 for Hydrocodone, page 35 for Methadone and page 55 for Tramadol

BI-STATE PHARMACY DEA #BB9718391 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 7 for Endcoet and page 19 for Oxycodone.

OLDE PHILLY PHARMACY #3 DEA #F01723584 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 1 of data provided.

FAIRWAY PHARMACY DEA #FF2266371 – Controlled substance purchasing was granted in May 2011. After an additional review in February of 2012, the most popular products were Hydrocodone and Carisoprodol which we have seen in Houston, TX before and we discontinued controlled substance sales.

OAKLAND PHARMACY DEA #B007980774 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 1, Multiple oxycodone products in top 10.

WOODLAWN PHARAMCY DEA #BL8102585 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 7 for Hydrocodone

PHARMA 1 DEA #FP1856446 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 1 of data submitted for top products. Mostly controlled substances.

REX PHARAMCY LLC DEA # F91993410 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. See page 2 for Hydrocodone.

ACCOKEEK DRUG HEALTH DEA #BA6800216 - Reviewed dispensing information provided and discontinued controlled substance sales based on quantities being dispensed. Their top 7 products were all schedule II controlled substances. See page 1 of dispensing data. Oxycodone 30 mg is #1 product.

NORTHCHESTER PHARMACY DEA#FN2221745 – New account in 09/10. Discontinued sales in 10/10. Reviewed dispensing information provided will not reinstate access to controlled substances. See page 2 for Alprazolam, page 5 for Carisoprodol, page 12 for Hydrocodone, and page 25 for Tramadol

WEIGHT AND WELLNESS INC DEA#FW2230857 – Access to controlled substances denied. This is a south Florida pharmacy specializing in diet and weight loss. Not comfortable with Phentermine being their number 1 product.

HOUCHENS NORTH FOODS, LLC #FB0954885 - Access to controlled substances denied. Dispensing data reviewed and top 5 of 6 products were controlled substances.

PENLAR PHARMACY DEA #BP6031087 – This customer was inadvertently “cut off”. A review of their customer questionnaire and dispensing data was done and access to controlled substances reinstated.

ABYS PHARAMCY DEA #FA0616334 – Customer was asked to provide dispensing data and did not. Access to controlled substances was removed. Additional information and a letter was submitted for review. Upon review of all information provided access to controlled substances granted

From: Chaney, Katherine L. [<mailto:Katherine.L.Chaney@usdoj.gov>]

Sent: Thursday, July 19, 2012 12:35 PM

To: Michael Cochrane

Cc: Mitchell, Valerie D.; Geldhof, James; Walker, Robert

Subject: RE: 2Record Request

So the customer "cut off" list does not reflect suspicious orders?

Kathy Chaney

From: Michael Cochrane [<mailto:Michael.Cochrane@Andanet.com>]
Sent: Thursday, July 19, 2012 12:32 PM
To: Chaney, Katherine L.
Subject: Re: 2Record Request

No problem. I will get it back to you this afternoon. That is correct, controlled substance sales were not necessarily discontinued because of a suspicious order.

Thanks
Mike

From: Chaney, Katherine L. [<mailto:Katherine.L.Chaney@usdoj.gov>]
Sent: Thursday, July 19, 2012 12:15 PM
To: Michael Cochrane
Subject: RE: 2Record Request

Yes, I would appreciate a line by line response. If I understand your response, these customers were discontinued for reasons not necessarily related to a suspicious order?

Kathy Chaney

From: Michael Cochrane [<mailto:Michael.Cochrane@Andanet.com>]
Sent: Thursday, July 19, 2012 12:11 PM
To: Patrick Cochrane; Chaney, Katherine L.; Alberto Esteves
Cc: Mitchell, Valerie D.; Geldhof, James; Walker, Robert
Subject: RE: 2Record Request

Ms. Chaney,

With regard to question #2 and #5, we have been and still are conducting ongoing reviews of existing and new customers. The information provided is what we have used for making our decision to discontinue or deny controlled substance sales to these registrants. With that being said, it does not mean they came up utilizing our orders of interest/soms to conduct this review.

We have discontinued or denied sales to these registrants, more often than not, based on the product mix we see in their dispensed data provided.

Would you like for me to review the listing from #2 and give a specific reason for discontinuing or denying controlled substance sales to each of them?

As an example, our reasoning for discontinuing sales to Accokkek Drug was based on their most popular products and the amount dispensed. Their top 7 products were all schedule II controlled substances and the quantities were extremely high in comparison to most other products.

Please let me know if you have any additional questions or would like a line by line response for each of the registrants we have discontinued or denied from Valerie's initial email.

Thanks You
Michael Cochrane

From: Patrick Cochrane
Sent: Thursday, July 19, 2012 11:52 AM
To: Chaney, Katherine L.; Michael Cochrane; Alberto Esteves
Cc: Mitchell, Valerie D.; Geldhof, James; Walker, Robert
Subject: RE: 2Record Request

Ms. Chaney-

I have forwarded this email to Mr. Michael Cochrane. He is Anda's Executive Director of Compliance and our custodian of records. He will reply with explanations regarding the customers cut off.

Regarding the inquiry about "cut off" and "controls denied", the customers detailed in the "cut off" list are customers that previously had controlled substance business with Anda that we are no longer servicing. The customers detailed in the "controls denied" list are those that had not previously done business with Anda that requested controlled substances and Anda chose not to service.

Please let us know if there are additional questions.

Patrick

Patrick Cochrane
Vice President, Logistics/Operations
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From: Chaney, Katherine L. [<mailto:Katherine.L.Chaney@usdoj.gov>]
Sent: Thursday, July 19, 2012 11:32 AM
To: Patrick Cochrane
Cc: Mitchell, Valerie D.; Geldhof, James; Walker, Robert
Subject: RE: 2Record Request

Mr. Cochrane,

I have done a preliminary examination of the records provided on the flash drive by Mr. Esteves. I still do not find an answer to several of DI Mitchell's questions. Reference her email below, specifically:

#2. The question was why the customers were "cut off." While you sent what appears to be partial information (mostly questionnaires and drug utilization reviews), I found nothing in the files that corresponds to documentation as outlined in your SOP #040, dated December 2011 and April 5, 2012. I also found nothing to explain the circumstances surrounding the decision to drop these registrants as customers.

#5. The question requested specific information regarding the information used to discontinue, deny, or reinstate customers/and or sales to customers. Mr. Esteves responded, stating that the "cut off" list contains information used to make these decisions. I find nothing in these spread sheets that provides such an explanation.

Also, I do not understand the difference in your spread sheets between customers "cut off" and "controls denied", and the basis for the actions.

Please provide clarification at your earliest convenience. If you have questions, please contact me.

*Katherine L. Chaney
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From: Patrick Cochrane [<mailto:Patrick.Cochrane@Andanet.com>]
Sent: Tuesday, July 17, 2012 3:37 PM
To: Chaney, Katherine L.
Subject: Re: 2Record Request

Agreed. We are looking into why the email was not received.
None of our team would ever not respond to an email. Especially not from DEA.

From: Chaney, Katherine L. [<mailto:Katherine.L.Chaney@usdoj.gov>]
Sent: Tuesday, July 17, 2012 03:29 PM
To: Patrick Cochrane
Cc: Mitchell, Valerie D. <Dawn.V.Mitchell@usdoj.gov>; Geldhof, James <James.Geldhof@usdoj.gov>; Walker, Robert <Robert.Walker@usdoj.gov>
Subject: FW: 2Record Request

Thank you for your response.

DI Mitchell actually sent three emails; the third one was dated yesterday. She also spoke to Mr. Esteves by phone on Friday, July 13th and explained that she would be sending a list of the information needed, and that timeliness was essential.

Since DI Mitchell and Mr. Esteves have been communicating by email for some time, I am surprised that her emails would suddenly move to a spam or junk folder.

Please contact either DI Mitchell or me to let us know exactly when the records will be available.

Thank you,

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From: Mitchell, Valerie D.
Sent: Tuesday, July 17, 2012 3:19 PM
To: Chaney, Katherine L.
Subject: FW: 2Record Request

Valerie Mitchell
Diversion Investigator
Columbus District Office
Telephone: 614-255-4142
Fax: 614-469-5788

From: Mitchell, Valerie D.
Sent: Monday, July 16, 2012 11:39 AM
To: Alberto Esteves (Alberto.Esteves@Andanet.com)
Subject: FW: 2Record Request

Please advise if you received this email along with the original request on Friday.

In regards to this, it would be top 20 highest volume

ANDA/OHIO: Who are the highest volume controlled substance customers in 2012? Please provide due diligence files for those customers - whether they are current customers or not (active or inactive).

ABYS PHARAMCY DEA #FA0616334

3. ANDA/OHIO: Who are the highest volume controlled substance customers in 2012? Please provide due diligence files for those customers - whether they are current customers or not (active or inactive).
4. Has ANDA reported any suspicious orders to the DEA Columbus DO this year?
5. In regards to "cut off" lists: Please define or explain the categories on the cut off/denied/reinstated list.

Please forward information to Valerie Mitchell and Kathy Chaney at Katherine.L.Chaney@usdoj.gov

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