

To Do

Subject: Add to the DEA Manual

Starts:

Priority:

Medium

Due: Yesterday

Type:

Personal To Do

Repeats

Mark Private Others cannot see any details about this event.

Notify me Have Notes notify you before the event.

Categorize: Justin

Description:

fyi, please add to our manual....DEA

Below explains how current reports are calculated.

How OTC products with List 1 Chemicals are reported :

1. The average-order-count per item / per whse is calculated by using the warehouse-order-count / number of stores serviced. This is based on 13-months data, i.e. the last 12 months plus the current month reporting period.
2. The average-order-count computed from #1 is multiplied by factor 8 to calculate for the purchase-limit.
3. A store with ordered-quantity in excess of the purchase-limit will be reported
  - 3.1 For violation in 2 months in a row within the last 6 months. 2 months are shown in the report
  - 3.2 For violation in excess of 2 months, but within the last 6-month period. All months with violation are shown in the report.
  - 3.3 2 months of violation but not consecutive are not reported.

Note: Data from this is retrieved from daily Billings transmission from each whse. PSE List One items are selected based on Item-records from Marketing with Product-type tagged as 'PSE LIST ONE'

How Controlled-Drugs are reported :

PLAINTIFFS TRIAL  
EXHIBIT  
P-20659\_00001

WAGMDL01166369

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P-20659\_00001

1. average-monthly-order per item is calculated using total-qty-ordered / total-stores-serviced.

This is based on 13 months data, per category, per whse.

2. the average-monthly-order computed from #1 is multiplied by item-factor or store-factor or category-factor to calculate for the purchase-limit.

\*\* category code & factor is determined based on a range of amount of a store's monthly average-rx-filled. Factor is set to 3.

\*\* average-rx-filled is computed by total-rx-filled for the month / no.of days store is open for the month

3. total-stores-order for the month (by whse, catgry, item) if exceeded the purchase limit constitutes suspicious order and will be reported.

Note: Data from this is retrieved from daily Billings transmission from each whse that has OPER-STUDY-NO of 001(prescriptions) & 015(RX-OTC). This is further filtered with selecting records with dangerous-drug-ind of 'A'(Arcos) or 'C'(Controlled-Drugs).

Thanks!  
Melanie Soliva  
(847) 914-8590

Jim Strzalka  
03/09/2006 11:05 AM  
To: Melanie Soliva/Corp/Walgreens@Walgreens  
cc: Sue Labbe/Corp/Walgreens@Walgreens, Scott  
McArthur/Corp/Walgreens@Walgreens  
Subject: Fw: Suspicious Transactions

A quick look .  
Points 4 & 5 are new.

— Forwarded by Jim Strzalka/Corp/Walgreens on 03/09/2006 10:35 AM —

Todd Steffen  
03/09/2006 10:33 AM  
To: linda.rambo@walgreens.com@Walgreens, sue.thoss@walgreens.com@Walgreens,  
Jim Strzalka/Corp/Walgreens@Walgreens  
cc:  
Subject: Suspicious Transactions

Linda - Please follow up with Jim to see if our current reports match these requirements. A meeting with some pre-reading makes sense if that's how you want to go.

— Forwarded by Todd Steffen/LOG/Walgreens on 03/09/2006 10:31 AM —

Dwayne Pinon  
03/09/2006 10:16 AM

To: Todd Steffen/LOG/Walgreens@Walgreens, Kalani  
Reelitz/Corp/Walgreens@Walgreens  
cc:  
Subject: Suspicious Transactions

Per our discussion.

[http://www.deadiversion.usdoj.gov/pubs/manuals/chem/appendix/app\\_e.htm](http://www.deadiversion.usdoj.gov/pubs/manuals/chem/appendix/app_e.htm)

#### Appendix E-3

#### Suspicious Order Reporting System for Use in Automated Tracking Systems Terms & Definitions

This voluntary formula is for use by distributors to wholesale and retail levels. The formula calculates the quantity which, if exceeded in one month, constitutes an order which may be considered excessive or suspicious and therefore require reporting to DEA.

- 1) Add purchase quantities for the last 12 months for all customers within same Distribution Center and for customer type (Hospital, Pharmacy or Other) for any List I chemical containing item stocked by the Distribution Center.
- 2) Add Customer months for every record used in above total. (Months within the last 12 that customer purchases of the item were not zero.)
- 3) Divide total quantity purchases by the total customer months.
- 4) Then multiply by the factor below to give the maximum amount that the customer can order per month before showing up on the suspicious order report.  
Note: Factor equals 3 for C-II and C-III Controlled Substances Containing List I Chemicals and 8 for C-III-IV-V Controlled Substances and non-Controlled OTC products containing List I chemical items.
- 5) At the end of each month, a report will be transmitted to DEA (separate reports for List I Chemicals and Schedule II-V Controlled Substances) of all purchases of List I Chemicals and/or C-II-V Controlled Substances and List I containing OTC items by any customer whose purchase quantities exceed the parameters (above) any (2) consecutive months or in three (3) of any moving six (6) month period.

Using a computer to manage and report on high volume transaction business activities with extremely short order cycle times (receipt to delivery) is the only viable, cost effective methodology for the reporting of orders which may be considered excessive or suspicious.

Dwayne A. Pinon, RPh, Senior Attorney  
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Deerfield, IL 60015  
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(847) 315-4660 (fax)

The contents of this message are confidential attorney work product and may be protected by the attorney-client privilege. If you have received this message and are not the intended recipient, please contact the sender at [dwayne.pinon@walgreens.com](mailto:dwayne.pinon@walgreens.com).

Vendor Inform All Rxs Vendors

Vendor #	Vendor Long Name	Contact Name	Address	City	State	Ap	DEA #
000920	AAI PHARMA (BRANDI) C	AAI PHARMA - CUSTOMER SERVICE	14 INGRAM BLVD	SUITE 100			
004218	ABBOTT C - AMERISOURCE BERGEN	INGER ORMSBY	ONE INDUSTRIAL PARK		LAVERGNE	TN	37086 RC0229965
004219	ABBOTT C-CARDINAL	BROKERAGE	7000 CARDINAL PLACE		WILLIAMSTON	MI	48895 RA0290736
000103	ABLE LABS C	MELANIE CAMERON	ONE ABLE DR		DUBLIN	OH	43017 IIIIII
000181	ABRIKA C	LAURA JOLLEY	13800 NW 2ND ST	STE 190	CRANBURY	NJ	8512 RC0169068
006706	ALPHARMA C	PAT CORRISON	7205 WINDSOR BLVD		SUNRISE	FL	33225 RA0287020
065521	ALPHARMA PUREPAC C	PAT CORRISON	200 ELMORA AVE		ELIZABETH	NJ	7207 RK0145818
004210	APOTEX CORP C	GWIN COPELAND	2400 COMMERCE PKY	SUITE 400	WESTON	FL	33226 RG0208581
005629	AUXILIUM PHARMACEUTICALS C	AUXILIUM PHARMACEUTICALS	4000 BELTLINE RD	SUITE 115	ADDISON	TX	75001 RJC248586
006700	BARR-C LINE	CUSTOMER SERVICE GROUP	400 CHESTNUT RIDGE RD		WOODCLIFF LAKE	NJ	7677 RB0146197
008906	BIOVAIL PHARM C-MCKESSON	RICKY TERRELL	1220 SENLAC DRIVE		CARROLLTON	TX	75006 RM0207286
020863	BIOVAIL PHARMACEUTICALS C	DAVE GRUBAUGH	8082 SAGAMORE LANE		KALAMAZOO	MI	49004 RD0205313
010921	BRECKENRIDGE C	LAURENCE RUNSDORF	P O BOX 206		BOCA RATON	FL	33429 RD0205333
011082	BRIGHTON PHARMACEUTICALS C	DOUG BARATTA	201 SHANNON OAKS CIRCLE	SUITE 200	CARY	NC	27511 RD2446886
054394	CARDINAL HEALTH REPACK C	JOE SHERMAN	3540 EAST PIKE		ZANESVILLE	OH	43701 RN0209583
013831	CARDINAL RX C WHOLESAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 RW0263056
027725	CELLTECH C	CUSTOMER SERVICE	331 CLAY ROAD		ROCHESTER	NY	14623 RM0219445
027727	CELLTECH C - CARDINAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 RW0236009
018544	CYPRESS PHARMACEUTICAL C	GREG STOFKO	P O BOX 1483		RIDGELAND	MS	39158 RC0186343
024872	ENDO C - CARDINAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 RW0236009
024864	ENDO PHARM CII	LIVINGSTON HEALTHCARE SERVICES INC	1810 DANIELSON PLACE		MEMPHIS	TN	38114 RD0160539
024870	ENDO PHARMACEUTICALS C	ATTN: BECKY LOVIN	100 PAINTERS DRIVE		CHADDS FORD	PA	19217 RD0160539
025341	ETHEX CORPORATION C	RAY WALKER	10888 METRO COURT		ST LOUIS	MO	63042 RD0189767
025603	EVERETT LABORATORIES INC C	GARY MESSINGER	29 SPRING STREET		WEST ORANGE	NJ	7052 RB0160262
054520	FOREST C AMERISOURCE BERGEN	INGER ORMSBY	ONE INDUSTRIAL PARK		WILLIAMSTON	MI	48895 RA0290736
054537	FOREST C-CARDINAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 IIIIII
029914	GATE PHARM C-MCKESSON	RICKY TERRELL	1220 SENLAC DRIVE		CARROLLTON	TX	75006 RM0207286
029912	GATE PHARMACEUTICALS C	BONNIE CANOVA	650 CATHILL ROAD		SELLERSVILLE	PA	18960 RL0146274
058288	GLOBAL PHARMACEUTICAL C	MITCHELL GOLDBERG	CASTOR & KENSINGTON		PHILADELPHIA	PA	191245694 RG0227567
035133	HE-TECH PHARMAL C	SUSAN RYAN	369 BAYVIEW AVE		AMITYVILLE	NY	11701 RH0180771
037905	INWOOD LABS C	MARTIN KLEIN	300 PROSPECT ST		INWOOD	NY	11696 PQ0237374
008895	IVAX PHARM C	BONNIE CANOVA	1400 LEGRAND AVE		NORTHVALE	NJ	7947 PZ0022121
042967	LANNETT CO C	CUSTOMER SERVICE	900 STATE RD		PHILADELPHIA	PA	19136 RL0172623
047912	MALLINCKRODT C	DOSEAGE PRODUCTS DIVISION	900 HORNET		HAZELWOOD	MO	63042 RM0270037
049203	MD PHARMACEUTICAL C	MARK BURSACK	3501 W GARRY AVE		SANTA ANA	CA	92704 RM0164171
051500	MONARCH C-MCKESSON	RICKY TERRELL	1220 SENLAC DRIVE		CARROLLTON	TX	75006 RM0207286
051764	MONARCH PHARMACEUTICAL C	CUSTOMER SERVICE	100 19TH STREET		BRISTOL	TN	37620 RK0202123
060900	MORTON GROVE C	GREG WATKINS	6451 MAIN STREET		MORTON GROVE	IL	60053 RM0214471
052986	MUTUAL PHARM C	BROWN MASSEY	110 ORTHODOX STREET		PHILADELPHIA	PA	19124 RM0110130
053179	MYLAN C	DAVID WORKMAN	P O BOX 4510		MORGANTOWN	WV	265044310 PM0032437
060130	PARC PHARMACEUTICAL	DIANA KOLACKI	ONE RAM RIDGE ROAD		SPRING VALLEY	NY	10977 PP0244703
060869	PATRIOT PHARMACEUTICALS	JOEL SHER	718 HESEMANN BRIDGE COURT		WILDWOOD	MO	63021 P00154625
062224	PITZER C	DIANNE KIERN	PO BOX 647		FLK GROVE VILLAGE	IL	60007 III778240
032825	Pfizer-Greenstone LTD C	LORI SHOEMAKER	8225 MOORSBRIDGE RD		PORTAGE	MI	49002 T00090000
043632	PHARMACEUTICAL ASSOCIATES C	DEBBIE DAVIS	201 DELAWARE ST		GREENVILLE	SC	29605 RP0286383
063795	PLIVA C	LOKEL PATEL	17 WEST STREET		EAST HANOVER	NJ	7956
064551	PRASCO LABORATORIES C	CHRIS ARINGTON	7155 E KEMPER RD		CINCINNATI	OH	45249 RP0286030
066026	QUALITEST PRODUCTS C	TREY PROBST	130 VINTAGE DR		HUNTSVILLE	AL	35811 R00110453
066456	RANBAXY C	BARBARA FARBER	600 COLLEGE RD EAST		PRINCETON	NJ	8540 RR0288428
068510	ROCHE C-MCKESSON	RICKY TERRELL	1220 SENLAC DRIVE		CARROLLTON	TX	75006 RM0207286
054305	ROCHE LABORATORIES C	CUSTOMER SERVICE	340 KINGSLAND STREET		NUTLEY	NJ	7110 PH0041929
069278	ROXANE LABS C	CUSTOMER SERVICE DEPT	900 RIDGEBURY ROAD	P O BOX 368	RIDGEFIELD	CT	6877 RR0112526
030881	SANDOZ C	LORI BOND	506 CARNEGIE CENTER	SUITE 400	PRINCETON	NJ	8540 P00125713
070613	SANOFI C AMERISOURCE BERGEN	INGER ORMSBY	ONE INDUSTRIAL PARK		WILLIAMSTON	MI	48895 RA0290736
070617	SANOFI C PHARMACEUTICALS-CARDINAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 IIIIII
072389	SEPRACOR C-CARDINAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 IIIIII
072371	SEPRACOR INC C	HELENA GONCALVES	111 LOCKE DRIVE		MARLBOROUGH	MA	1753 RC0229965
072373	SEPRACOR INC C AMERISOURCE BERGEN	INGER ORMSBY	ONE INDUSTRIAL PARK		WILLIAMSTON	MI	48895 RA0290736
015672	TEVA C	BONNIE CANOVA	P O BOX 630		SELLERSVILLE	PA	18960 RL0146274
082695	UNIMED C AMERISOURCE BERGEN	INGER ORMSBY	ONE INDUSTRIAL PARK		WILLIAMSTON	MI	48895 RA0290736
082698	UNIMED C-CARDINAL	BROKERAGE	7000 CARDINAL PLACE		DUBLIN	OH	43017 IIIIII
086640	UNITED RESEARCH LABS C	PO BOX 8546	3809 MEADOW LN		BENSLEM	PA	190208546 RG0208581
086644	UPSHER-SMITH LABS C	CUSTOMER SERVICE	6701 EVENSTED DR		MINNEAPOLIS	MN	55369 PU0223379
086625	URL C	CUSTOMER SERVICE	1102 ORTHODOX ST		PHILADELPHIA	PA	19124 PU0016053
087148	VARSITY LABS C	JO WEAVER	301 SNOW DRIVE		BIRMINGHAM	AL	35209 RA0290863
089455	VISION PHARMA C	SANDER BUSMAN	1973 HIGHWAY 34		WALL	NJ	7717 B00000000
079788	WATSON C-MCKESSON	RICKY TERRELL	1220 SENLAC DRIVE		CARROLLTON	TX	65527 RM0207286
091163	WATSON LABORATORIES C	CUSTOMER SERVICE	311 BONNIE CIRCLE		CORONA	CA	91718 RW0184159

Vendor Inform All Rxs Vendors

Vendor #	Vendor Long Name	Contact Name	Address	City	State	Zip	DEA #
091170	WATSON LABS C	DAVID SCHMIDT	311 BONNIE CIRCLE DR	CORONA	CA	91730	RW0184159
092940	WESTWARD PHARMACEUTICAL C	KATIE GOLDBERG	465 INDUSTRIAL WAY W	EATONTOWN	NY	7724	RW0166707
098127	KANODYNE C-MCKESSON	RICKY TERRELL	1220 SENLAC DRIVE	CARROLLTON	TX	75006	RM0207286

WAGMDL01166373

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P-20659 \_ 00005

Kalani Reelitz  
02/28/2006 03:57 PM


To: Ed Choroski/Corp/Walgreens@Walgreens  
cc: Scott Fink/Corp/Walgreens@Walgreens, Justin  
Joseph/LOG/Walgreens  
Subject: DEA Suspicious Drug Report - Address Correction

The DEA has informed Perrysburg that the address the Suspicious Drug Report is sent to is incorrect. Please update in our system to show the corrected address below.

Attention: Diversion Group #1  
431 Howard Street  
Detroit, Michigan 48226

Thank you,

Kalani Reelitz  
Internal Audit  
847.964.4293



Administrative Manager  
Walgreens Perrysburg Distribution Center  
28727 Oregon Rd.  
Perrysburg, OH. 43551  
419-662-4061



Justin Joseph  
03/04/2006 09:42 AM

To: Todd Polarolo/LOG/Walgreens,  
cc: Terry Watkins/LOG/Walgreens, Sue Thoss/LOG/Walgreens, Steve  
Kneller/LOG/Walgreens,  
Subject: DEA Audit Day 5 Perrysbug 3/3/06

Friday was a short day for the auditors we discussed the following.

HR(Lynn Mailloux)  
Number of employees  
Hiring Packet  
Drug Screening information  
Background Check information

Asset Protection(Tonia Ramos)  
Alarm Report from previous walk through  
Address and Phone number of FE Moran

Operations(Justin Joseph)  
% of lines that are controlled  
Inbound Procedures  
Outbound Procedures  
List of Couriers used by transportation  
Weekly and Bi-Annual Inventory

They also supplied 18 documents and handouts that include information on PSE products and DEA Notice's. These documents are not sent by the DEA but are available on their website. Updates could also be provided during our next audit.

The Auditors will return on Monday 3/6 to review their findings.

Justin Joseph  
Administrative Manager  
Walgreens Perrysburg Distribution Center  
28727 Oregon Rd.  
Perrysburg, OH. 43551  
419-662-4061



Justin Joseph  
02/27/2006 06:09 PM

To: Todd Polarolo/LOG/Walgreens@Walgreens, Steve Kneller/LOG/Walgreens@Walgreens  
cc:  
Subject: DEA Audit Day 1

Today two DEA Diversion Investigators came on site James E. Rafalski and Angie R. Francis to complete a DEA Audit. They arrived at the building around 9:55am.

They requested to view the current inventory and all Receipts/Shipments of the following 8 items.

**DANGEROUS**

CLASS	DRUG INDICATOR	ITEM NUMBER	ITEM DESCRIPTION	QTY AVAILABLE	COUNT	ASST	POSITION
4	C	594167	ALPRAZOLAM XR 2MG TAB (GRN) 60	206	206	G108C	40
4	C	594167	ALPRAZOLAM XR 2MG TAB (GRN) 60	96	96	GB05B	0
4	C	859657	DARVOCET - N 100 TAB (AAI) 100NP	126	126	G107C	50
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	101	101	G104D	20
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	4	4	CTDMG	0
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	84	84	GC05B	0
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	816	816	GC03G	0
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	996	996	GB02A	0
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	576	576	GB10A	0
5	C	674484	CHERATUSSIN AC SYRUP 16OZ	780	780	GB06F	0
3	A	675756	HYDROCOD-APAP 10-500 TB 500	84	84	G108E	10
3	A	675756	HYDROCOD-APAP 10-500 TB 500	708	708	GC02A	0
3	A	675756	HYDROCOD-APAP 10-500 TB 500	288	288	GA11A	0
4	C	677997	PHENOBARBITAL 1/2 GR TAB 1000	79	79	G108A	35
4	C	677997	PHENOBARBITAL 1/2 GR TAB 1000	36	36	GA06B	0
3	A	684544	VICODIN ES 7.5-750 TAB(ABB) 100NP	298	298	G103E	25
3	A	684544	VICODIN ES 7.5-750 TAB(ABB) 100NP	120	120	GA03B	0
3	A	684556	VICODIN 5/500 TAB (ABB) 100NP	268	268	G103E	20
4	C	685928	XANAX 1MG TAB 100	111	111	G108D	5



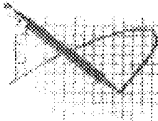
ItemsForAudit02-27-06.xls

All counts were correct and all receiving information has been provided, Shipping information will be provided on 2/28/06. For the receiving documents they were initially looking for the actual PO of the items ordered, which we do not keep on site. I placed a call to Kilani Reelitz, he stated that this has never been a request. The DEA Representatives said that we may use "Central Record Keeping" which would indicate that PO's are kept in a central location for all facilities.



The auditors left the building at 5:15pm and will return around 8:30am on Tuesday 2/28.

Justin Joseph  
Administrative Manager  
Walgreens Perrysburg Distribution Center  
28727 Oregon Rd.  
Perrysburg, OH. 43551  
419-662-4061



Justin Joseph  
03/02/2006 06:11 PM

To: Todd Polarolo/LOG/Walgreens@Walgreens  
cc: Terry Watkins/LOG/Walgreens@Walgreens, Sue  
Thoss/LOG/Walgreens@Walgreens, Steve  
Kneller/LOG/Walgreens@Walgreens  
Subject: DEA Audit Recap Perrysburg 3/2/06

Today's discussion centered around suspicious drug report and PSE items. Highlighted in red are the items that I am struggling to come up with answers for.

**Suspicious Drug Report**

Q:Where does the DEA Factor come from?

A:This is our determination of a suspicious order. (Kalani Reelitz)

Q:How do we get the average

A:This is by DC and takes the number of daily scripts filled by the store, then groups stores in groups of 25. There is then an average taken of the orders by item. (Kalani Reelitz)

Q:Who determines when a regulated transaction level has been met?

This question has yet to be answered, here are two links they provided to describe a regulated transaction and their requirements.

[http://www.dea diversion.usdoj.gov/21cfr/cfr/1300/1300\\_02.htm](http://www.dea diversion.usdoj.gov/21cfr/cfr/1300/1300_02.htm)

[http://www.dea diversion.usdoj.gov/21cfr/cfr/1310/1310\\_06.htm](http://www.dea diversion.usdoj.gov/21cfr/cfr/1310/1310_06.htm)

**PSE LIST ONE**

Q:How many PSE LIST ONE items do we carry?

A:118 provided by query of file di164p.

Q:Who designates items as PSE LIST ONE?

A:Buyers(Pete Strohmayer)

Q:How do we determine a LIST ONE item vs. a PSE LIST ONE item?

A:Have not been able to get one answer on this? At one point I was told they are both in this file but then I was told we only show PSE LIST ONE items in this file. There are other types in this file but for list one we only look at PSE LIST ONE.

Q:Do we sell ephedrine items?

A:Have not been able to get answer for this.

Item number 664464 PSEUDOEPHEDRINE is not listed as a PSE LIST ONE item in file DI164P and is stored in Rx. Is there a reason?

They requested to see the locations we keep PSE LIST ONE. All PSE LIST ONE items are dedicated in L8 and have backups in either the crane or flow racks. They seemed to be ok with this.

The only other outstanding question I have is if we have filed for central record keeping. This question came from the fact that we do not keep the actual Purchase Order that is placed to the vendor in our facility;

**Redacted – Attorney Client Privileged**

**Redacted – Attorney Client Privileged**

They also requested a copy of the CM15 manual;

**Redacted – Attorney Client Privileged**

Justin Joseph

## DEA Communication

### Example

- Item Handling Request
- Central Record Keeping Letter

### Controlled Substance Order Monitoring and Prevention System

The Controlled Substance Order Monitoring and Prevention System is designed to limit or prevent the quantities of controlled substances that are ordered from the distribution centers that otherwise may be considered excessive under DEA regulations. This system is used to identify and modify potentially suspicious orders of controlled substances and pseudoephedrine products prior to the order being sent to the warehouse for fulfillment.

Orders for controlled substances are monitored for unusual quantity, frequency and/or inventory adjustments. Each pharmacy is looked at individually. The computer program determines the maximum order size (threshold) as it pertains to a tolerance limit and order frequency for each drug.

Enhanced reporting includes identification of those pharmacies whose orders deviate from a normal pattern established by district or market groupings.

If an order is identified as exceeding the predetermined limit, it is automatically decreased, thereby ensuring that our distribution centers do not fulfill any potentially suspicious orders.

Orders whose quantities have been modified or have been flagged due to inventory adjustments are compiled into weekly and monthly reports to be reviewed and monitored by Walgreens corporate personnel. Pharmacies which are repeatedly identified will be elevated to a high-risk category for investigation into potential diversion activity.

The review process is used to determine if the orders can be justified from an operational perspective due to a legitimate business reason such as closing of competition or obtaining new business. Retraining of pharmacy staff or additional investigation by Loss Prevention may be necessary.

04/02/2012

Factor is 3 (2)  
 Factor is 8 (2.5)  
 + PSE