

U.S. Department of Justice
Drug Enforcement Administration

REPORT OF INVESTIGATION

Page 1 of 16

1. Program Code	2. Cross File	Related Files	3. File No. [REDACTED]	4. G-DEP Identifier
5. By: Inv. Gayle W. Lane At: Miami, FL	<input checked="" type="checkbox"/> [REDACTED] <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		6. File Title WALGREEN CO 15998 Walgreens Drive Jupiter, FL 33478	
7. <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:			8. Date Prepared 12/01/04	
9. Other Officers: Inv. Janice Barnes				
10. Report Re: Scheduled In-depth Investigation, Distributor, DEA #RW0277752 [REDACTED]				

SYNOPSIS

This investigation was initiated pursuant to the FY 2004 Work Plan for the Miami, FL Diversion Control Group.

WALGREEN CO, 15998 Walgreens Drive, Jupiter, FL 33478, is registered with DEA #RW0277752 as a Distributor in Schedules 2 - 5, expiration 5/31/05. The firm supplies all WALGREEN pharmacies in the eastern half of the U.S. with Schedule 2 - 5 controlled substances and other merchandise.

This investigation was initiated on 5/24/04 and ended on 5/27/04. The audit revealed no discrepancies.

Since no significant violations were noted, this file is closed.

11. Distribution: Division	12. Signature (Agent) Inv. Gayle W. Lane	13. Date 1/14/05
District	14. Approved (Name and Title) Jan A. Hamilton, Acting G/S	15. Date 01/14/2005
Other [REDACTED]		

DEA Form - 6
(Jul. 1996)

gwl 7/3/04

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Drug Enforcement Administration

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CCSF v. Purdue Pharma,
et al. 3:18-CV-7591
WAG-MDL-00046
Admitted: 06/17/2022

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B. ENCLOSURE PAGE

1. DEA-82, Notice of Inspection dated 5/24/04
2. Computation Chart
3. Closing Inventory dated 4/24/04
4. Power of Attorney Notice
5. Building diagram
6. Security Contract
7. Letter dated 6/1/04

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DETAILS

C. BASIS OF INVESTIGATION

This in-depth investigation was initiated pursuant to the FY-2004 Work Plan for the Miami, FL Diversion Control Group.

D. SUBJECT FIRM'S BACKGROUND

1. General: The WALGREEN COMPANY is a pharmaceutical company which operates retail pharmacies and 12 distribution facilities nationwide. The company is incorporated in Illinois with corporate offices located at 200 Wilmont Road, Deerfield, Illinois 60015, telephone #708-940-2500. The corporate officers are:

David W. Bernauer	Chairman and CEO
Jeffrey A. Rein	President and COO
Jerome B. Karlin	Executive VP, Store Operations
George C. Eilers	Senior VP, Store Operations
J. Randolph Lewis	Senior VP, Distribution and Logistics
Julian A. Oettinger	Senior VP, General Counsel
Daniel COUGHLIN, AKA <u>Don</u>	Divisional VP, Distributions Operations

The WALGREEN COMPANY, hereinafter referred to as WALGREEN JUPITER, telephone no. (561) 493-7700, management team consists of the following:

<u>NAME/TITLE</u>	<u>DOB</u>	<u>SSN</u>
Robert M. VARN0, AKA Rob, <u>Distribution Center Manager</u> (DCM)	[REDACTED]	[REDACTED]
Robert M. ANNEY, Inbound Manager		
Daniel L. EIDE, Maintenance Manager		
Darrel FICO, Outbound Manager		
Glenn HULTBERG, Operations Manager		
Kevin E. JONES, Outbound Manager		
Stephen R. KING, Administrative Manager		
Larry <u>KRAEMER</u> , HR Manager		

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NADDIS checks for the corporate officers and management team revealed no derogatory information, only their affiliation with WALGREENS.

Mr. VARNO's immediate supervisor is Don COUGHLIN, mentioned above, who is located in Arizona. Mr. VARNO is responsible for the day to day operations of the WALGREEN JUPITER facility.

In addition to this facility in Jupiter, FL, the WALGREEN COMPANY also operates the following distribution centers:

2400 N. Walgreen Street, Flagstaff, AZ 86001, DEA #PW0221084
2455 Premier Row, Orlando, FL 32809, DEA #PW0122262
8110 Kempwood Drive, Houston, TX 77055, DEA #PW0018982
4400 State Road 19, Windsor, WI 53598, DEA #PW0211158
5100 Lake Terrace NE, Mount Vernon, IL 62864, DEA #RW0152467
7101 Presidents Drive, Ste 299, Orlando, FL 32809, DEA #RW0155994
125 N. Commerce Way, Bethlehem, PA 18017, DEA #RW0161872
2370 East Main Street, Woodland, CA 95776, DEA #RW0204026
710 Ovilla Rd, Waxahachie, TX 75167, DEA #RW0281953
28727 Oregon Rd., Perrysburg, OH, 43551, DEA #RW0294493
17500 Perris Blvd., Moreno Valley, CA 92551, DEA #RW0308216

Only this Jupiter facility and the Woodland, CA facility distribute Schedule 2 controlled substances.

There are two other centers which do not distribute controlled substances:
5300 St. Charles Road, Berkley, IL 60160, DEA #004767WEY
730 W. U.S. Highway 30, Valparaiso, IN 46383, a home medical center

The office hours of operation are 9 AM - 5 PM Monday - Friday. The warehouse hours are Sunday 7 PM - Friday 11 PM and Saturdays and Sundays 7:30 AM - 5:30 PM. There are 640 employees at this facility: 42 managers, 20 office staff, and 578 warehouse employees. This location supplies 472 WALGREEN pharmacy locations in Florida with all items found in a WALGREENS store. This facility began distributing Schedule 2 controlled substances in September 2002 to all WALGREEN pharmacies in the eastern half of the U.S. The firm now ships to approximately 1,967

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stores, with 352 new stores being added in July. Controlled substances are estimated to be approximately 1% of their total volume.

2. Registrations: WALGREEN JUPITER is currently registered as follows:

WALGREEN CO, DEA #RW0277752 as a Distributor I Schedules 2, 3, 3N, 4, and 5, expiring 5/31/05, initial registration date 10/12/01

State of Florida, Dept. of Health, Drugs, Devices, and Cosmetics, Prescription Drug Wholesaler, permit no. 22:01278, expiration 10/30/05

3. History: Miami Field Division files disclosed the following investigative history concerning WALGREEN JUPITER:

[REDACTED]: Approval of Application, 10/12/01

E. PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITY

On 5/24/04, Investigators Gayle W. Lane and Janice Barnes presented their credentials and issued a DEA Form-82, Notice of Inspection of Controlled Premises, to Robert M. VARNO, Distribution Center Manager (Enclosure 1). After reading his rights according to Title 21 CFR 1316.08(b), Mr. VARNO voluntarily signed the Notice, thereby consenting to the investigation. Mr. VARNO stated that he would be unavailable for the rest of the week and stated that Glenn HULTBERG, Operations Manager, would provide records and assistance. In addition, Lynda Szczepanik, CII Manager, provided assistance for the Schedule 2 portion and Tammy Thiel, Administrative Manager, provided assistance for the Schedule 3-5 portion.

F. SCOPE OF INVESTIGATION

The on-site portion of the investigation began on 5/24/04 and concluded on 5/27/04. The controlled substances audit period began at the beginning of business 6/20/03 and ended at the close of business 5/24/04. The following controlled substances were selected for audit based on their distribution volume and potential for abuse:

OxyContin 80 mg, 100 tablets

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Methadose 40 mg, 100 tablets
Methylphenidate 10 mg, 100 tablets
Duragesic 25 mcg patches, 5 per box

Hydrocodone 7.5/500 mg, 500 tablets
Tussionex Extended Release, 473 ml.
Testosterone Cypionate 10 ml, 200 mg/ml
Phentermine 37.5 mg, 100 tablets
Alprazolam 1 mg, 500 tablets
Promethazine and Codeine Phosphate 6.25 mg, 16 oz.

The audit disclosed no discrepancies. A computation chart which records the results of the audit is included as Enclosure 2.

The following records were reviewed during the course of the investigation:

Biennial Inventory
Count Sheet dated 6/20/03 (Beginning Inventory)
Controlled Item Receipts - Detail (Receipts)
Control Drug Shipments by Item Report (Sales)
Item Profile (Closing Inventory)

G. RECORD KEEPING

1. Beginning Inventory: Controlled substance split case items are inventoried daily and full cases are inventoried weekly. The firm performs a complete inventory of all controlled substances on December 31 of each year. The 6/20/03 weekly inventory was used as the beginning inventory.

2. Biennial Inventory: The DEA biennial inventory is taken on December 31 of every even year. The Investigators reviewed the biennial inventory dated 12/31/02 and titled 2002 Controlled Substances Inventory List and Records Compliance.

3. Closing Inventory: Investigators Lane and Barnes took a closing inventory of selected controlled substances on 5/24/04 (Enclosure 3).

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During the Schedule 2 inventory, Lynda Szczepanik, Sherrie Lineback, Function Mgr., and Glenn HULTBERG, Operations Mgr., accompanied the Investigators and verified the count. During the Schedule 3 inventory, Tammy Thiel and Glenn HULTBERG accompanied the Investigators and verified the count. The Investigators noted the WALGREENS Item Code (WIC) for each item. A SLP0225 Item Profile was used to verify on-hand quantities.

4. Receiving Records: The firm employs a "zero paper record" computer system. When a shipment of controlled substances is received, the computer generates a REPB 232 Manual Check-in Form. This form lists the purchase order number, vendor, item/description, and all information relative to the description and quantity of drug. Controlled substances are designated with a "c" in the "Ctrl Drug" box. This form is maintained by the WALGREEN JUPITER facility in their file room.

Utilizing the "zero paper record" system, the original invoice is sent directly from the supplier to the WALGREEN Accounting Center in Danville, Illinois for processing/payment. As each shipment is received, WALGREEN JUPITER updates the information on the computer which is connected to the Danville center, so that the entire system is up to date on receipts, without a delay in transferring documents. The firm has permission for central record keeping.

Upon request, the firm can generate a REPB 3079 WALGREENS Controlled Item Receipts - Detail Form. This form represents one week increments for each type of drug (ARCOS/Non-ARCOS) and indicates the date received, description, item number, case pack, ordered amounts, received amounts, control category, purchase order number, vendor, DEA number, freight bill, and carrier. The forms are filed in the file room by vendor and date.

The firm can also provide a REPB 263, Receiving Detail Report which is a summary of the information provided on the Manual Check-in Form. This form includes the receiving report number, vendor DEA number, address, item number. Description, amounts received. After the drugs are received at the receiving dock, a Secured Drugs Transport Form 1501 is prepared. This form documents the date of receipt, time, vendor, transporter, purchase order number, Rx Supervisor name, number of cartons on pallet, checker (in cage) name, carrier name and local number.

DEA Form - 6a
(Jul. 1996)

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Schedule 2 DEA Order Forms: The Schedule 2 DEA Order Forms, blue purchaser's copy 3, are attached to the purchase order and are stored in a locked office. All WALGREEN's records are kept for five years.

5. Sales Records: As each order is prepared, a Split Case Pick Document is generated. This computer generated form includes the following information: store number, order number, process date, store address, store and warehouse DEA numbers, bar scan ID number, location, quantity, item number, initials, description, and line number. The accompanying bar code label is removed from the form and placed on the side of the tote destined for the particular store. This form is completed by the picker and double checked by the auditor. The controlled substance totes are not marked to specifically identify controlled substances.

The controlled substances are then taken by locked wire cage to the shipping dock area. The transfer of the substances is documented via a Controlled Drug/Refrigerated Rx Transport Form 1076. This form includes the date, trailer number, dock number, store ID number, store number, control number, and initials. The date and time shipped is also indicated. This form is kept in the shipping department for 5 years.

The firm can generate a WALGREENS Control Drug Shipments by "Item" Report #SBPB 655. This computer printout shows the warehouse DEA number, ship date, purchaser DEA number, store name, address, quantities, shipment number, and shipment date. This form shows all sales for any particular item for any particular date.

Once a store receives a tote(s), the receiving clerk takes a bar code reader and scans the code on the end of the tote. The entire record of the shipment appears on the screen. The items are then recorded against the entries for each item. A "hard copy" form titled the WALGREEN Shipments Store Receiving Document is then generated by the respective store.

In addition, there are computer queries regarding damages (Acct. #99711) and returns (Acct. #90020) which aided in completing the audit.

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Schedule 2 Order Forms: WALGREENS has an arrangement with DEA ODR in which WALGREENS sends to ODR a computer disk with the DEA numbers of WALGREEN stores that need order forms. DEA HQS mails the order forms to one of the two WALGREENS distribution centers that handle Schedule 2 controlled substances. The WALGREENS Registration contact for these order forms is Ghana Giles. Unexecuted Order Forms are kept in a locked office. A notice indicating those employees having Power of Attorney to sign order forms is included as Enclosure 4. The blue purchaser's copy 3 is sent to the individual store along with the merchandise. The brown supplier's copy 1 is maintained chronologically by store number in a locked office.

6. ARCOS: The DEA ARCOS reports are prepared monthly via tape and are transmitted from the Deerfield, Illinois headquarters facility. On 5/18/04, Investigator Lane telephonically contacted Ernestine Reid, Reports Examiner in ARCOS. She stated that the company was current in its reporting. The Investigators reviewed ARCOS records and the 12/31/03 ARCOS inventory. There were a few instances where an NDC number didn't match up or where a DEA number for a store didn't match up. The Deerfield, IL facility reconciles the errors.

7. Returns to Vendors: All returns to vendors from the WALGREEN JUPITER facility are handled via a Vendor Return Claim Form #42. This form includes the following information: the name, address of the vendor/supplier, item code, item description, reason code, and quantity. WALGREEN JUPITER send all controlled substance destructions to USF Processors, Inc., Ft. Worth TX 76155, DEA #RR0191902.

H. SECURITY

1. Structure and Location: The WALGREEN JUPITER distribution center is located in unincorporated Jupiter, between Jupiter and Lake Okeechobee, in north Palm Beach County, off of Beeline Highway, S.R. 710, presently a rural area. Railroad tracks pass by the west side of the building. The exterior walls are prefabricated concrete. The ceiling/roof is constructed of metal panels. The building measures approximately 650,000 square feet. The Palm Beach Sheriff's office provides protection. Building diagrams of the facility, Schedule 2 vault area and Schedule 3-5 two-story area are included as Enclosure 5.

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2. Perimeter Security: The entire campus is surrounded by a fence and there is a guard house at the primary entrance. There are three entrance gates for vehicles and one exit gate. A security office is located in the northwest corner of the building. The front entrance doors are double glass doors set in a metal frame. Visitors then pass through a turnstile to arrive at the security desk. All other doors are fourteen-gauge metal doors with dead bolts. In addition, the doors are equipped with a magnetic contact device or are monitored by a camera. Every point of entry is covered by a camera. On the **west** side are 21 metal doors and one overhead door measuring 10' x 10'. On the **south** side are two metal doors and one overhead door measuring 12' x 16'. There are nine metal doors and three windows on the **east** side. There are four metal doors, one overhead door measuring 10' x 16' and two section doors measuring 9' x 8' on the **north** side. The **receiving dock**, located in the southeast part of the building, is equipped with 42 dock doors, six metal doors and six office windows. The **shipping dock**, located in the northeast part of the building, is equipped with 41 dock doors, five metal doors and ten windows. The shipping/receiving area is surrounded by an 8' tall chain link fence.

On the south side is the Automated Shipping and Retrieval System (ASRS) area, which is equipped with robots and manned by twenty-four employees. The ASRS area is separated from the rest of the building by a firewall and measures 98'7" high.

There are approximately 110 pan-tilt-zoom and fixed security cameras throughout the facility. There are seven monitors in the Loss Prevention Command Center located behind the security desk. The cameras are monitored 24 hours. Access to all work areas is through Diebold card access reader magnetic locks. Wall-mounted motion detectors are Radionics DS776Z/ZX776Z passive infrared intrusion detectors. All ceiling mounted motion detectors are Radionics DS938Z/ZX938Z ceiling mount passive infrared intrusion detectors.

3. Interior Security: The drug vault, vault staging area and cage are located on the east side of the prescription department, near the middle of the building. The prescription area walls are constructed of two sided

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double corrugated metal, 457.5' x 110', and measures 41,236 sq. ft. There are two high speed doors measuring 10' x 16' and two metal doors measuring 3' x 7'. The high speed doors are large overhead doors, controlled by card access, and open and close within a few seconds. The vault, cage and staging area are located within the prescription area. A Diebold electronic card system is used for access to the cage and vault. In addition, there is a pan-tilt zoom security camera monitoring the perimeter of the vault staging area. There are numerous robot-type vehicles called Automatic Guided Vehicles (AGV) traveling inside the warehouse. In addition, there are approximately 26 miles of conveyor belts in the warehouse.

4. **Schedule 2 Security/Vault:** Schedule 2 controlled substances are stored in a UL Class M modular vault, which was manufactured and installed by the Customs Vault Corporation, Ridgefield, CT. The vault entrance is located within a caged area. The vault interior is 58' x 67' x 44.67' x approximately 10.5' and measures 2,620 sq. ft. According to a letter dated 10/10/01 from Michael Elliot, VP, Custom Vault Corp., the five-sided UL Class-M vault is mounted on an 8" slab of 3,000 psi concrete with one grid of #4 re-bar on 6" centers.

The vault has two GSA-AR5 security vault doors, manufactured by Overly Door Company. Situated in the southwest corner of the vault is an Overly Class 5 double door, Serial #M5-460. It measures 8.67' x 8.33' and is equipped with four contact devices. Inside the double doors is a sliding day gate equipped with a magna lock. The self-closing day gate is constructed of no. 10 gauge wire mesh reinforced in the middle, and measures 7' x 8'. A single Overly Class 5 security vault door, Serial #65-3503, is located in the southeast corner and measures 6.87' x 4'. The locking mechanism for these doors are Mas-Hamilton X08s with a Group 1R lock.

The vault is equipped with a Potter vault sound alarm system, sixteen wall mounted passive infrared motion detectors (three in each corner, two in the two aisles), two cameras, two card access readers, and 1 visual blue strobe indicator light. Above the vault are twelve wall mounted passive infrared motion detectors. There is one pan-tilt-zoom security camera outside the vault area. Vault items are picked using a Pick-To-Light

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system (PTL). A computer processes the order form items and a light is displayed over the correct bay for the processor to pick. After picking, the processor flicks the light off. The Schedule 2 vault is alarmed from 5 PM to 5 AM.

A processing and packing area for Schedule 2 controlled substances, called the audit area, is located in front of the vault. This area is 61' x 84' and measures 5,125 sq. ft. and is equipped with a self-closing gate measuring 8' x 12' and two personnel doors measuring 3' x 7'. The gate and doors are constructed of no. 10 gauge wire mesh. Over each of the six audit stations is a fixed position camera.

A conveyor belt originates inside the vault door and ends in the staging area. There is one security camera in the vault, facing the vault door, and another security camera in the secured Schedule 2 staging area, facing the entrance to the caged area.

5. **Schedule 3-5 Security/Cage:** The Schedule 3-5 caged area comprises the mezzanine level and ground floor for receiving. The Schedule 3-5 controlled substances will be stored in a Standard Wire & Steel Works caged area which measures 83' x 84' for a total of approximately 6,972 sq. ft. The 10 gauge wire mesh fabric with 1/2" square mesh openings is welded onto 1 1/4" x 1 1/4" x 18" angle iron frame. This creates panels that are 4' x 10" that are stacked horizontally and mounted on vertical posts every ten feet. The posts are 2" x 2" square 14 gauge tubing. The posts are secured to the floor via 1/4" x 4" x 4" base plates that are bolted to the floor. All strategic heads and nuts have been welded to prevent removal.

There is a self-closing gate measuring 10' x 16', a sliding gate measuring 8' x 8', two mesh doors and two metal doors measuring 3' x 7'. The gate and mesh doors are constructed of no. 10 gauge wire mesh. The ground floor receiving cage area is equipped with 24 wall mounted passive infrared motion detectors, three 360 degree ceiling mounted passive infrared motion detectors, three security door magnetic contact switches, one fixed mount security camera and one pan-tilt-zoom security camera. The schedule 3-5 drug cage mezzanine area is equipped with 12 wall mounted passive infrared motion sensors, five 360 degree ceiling mounted passive infrared motion detectors and one pan-tilt-zoom security camera. The rear

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stairway area inside the drug cage is equipped with six wall mounted passive infrared motion detectors and one security door contact. There are two audit stations inside the cage. A conveyor belt with dead rollers within the caged area is used to convey the blue totes where items are placed for packing.

A large refrigerated metal cooler measuring 41' x 27' x 9.4' (1,107 sq. ft.) is located in the northwest corner of the mezzanine area. The firm stores controlled and non-controlled refrigerated items in the cooler and has permission to store non-controlled items in the refrigerated area.

6. Security Alarm Service: The security system is a Telguard T-3100 UL cellular alarm transmission system with a digital dialer. The alarm for the controlled substances area is on a separate zone from the rest of the distribution center. There are three separate alarm systems. The security system was installed by Meisner Electric Inc., Delray Beach, FL 33444. F.E. Moran Inc., Champagne, IL, is responsible for the upkeep and maintenance of the system. Rapid Response Inc., Syracuse, NY. monitors the security system. Adrian Kittner, Loss Prevention Supervisor, is responsible for the alarm and alarm codes. If there is an alarm condition, the monitoring company contacts Rob VARNO or Glenn HULTBERG. The Palm Beach Sheriff's Office responds to an alarm condition. The alarm contract is included as Enclosure 6.

On 5/24/04, Investigator Lane maintained telephonic contact with Operator 603, at Rapid Response in Syracuse, NY, telephone no. (800) 932-3822. The system was activated and tested and Inv. Barnes violated various systems. Operator 603 confirmed alarm signals for security alarm devices in the vault and cage. A strobe light functions when the alarm is triggered.

7. Personnel Security:

The following managers have the combinations to the vault:

Rob VARNO, Glenn HULTBERG, and Kevin JONES, previously identified in paragraph 4.

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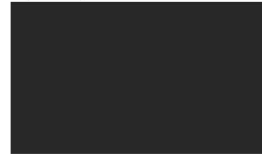
One of the following hourly team members are present when someone is in the vault or cage:

NAME/POSITION
DENIAKIS, Nick
HUTCHINSON, Sue
MONZOTE, Ricardo
SHIEBLER, Mary

DOB



SSN



NADDIS records were negative except for their affiliation with WALGREENS.

8. Hiring Policies and Employee Training: WALGREENS has contracted with CheckPoint Express to perform background checks, including criminal checks, for employees with access to controlled substances. Before the employee is allowed to handle Schedule 2 controlled substances, the company checks with the local police department. WALGREEN's Human Resources Dept. performs the reference checks.

9. Shipping: After orders are packed, they are locked in a shipping cage in either the vault or cage until shipment time. Shipping cages remain in the vault or cage until the carrier arrives. Two team members accompany the merchandise to the carrier. A manifest of all shipments will be retained on site. The schedule 2 drugs are now shipped via FedEx and the schedule 3-5 drugs are shipped via WALGREEN trucks.

By letter dated 6/8/04, the firm requested permission to place the locked shipping cages outside the vault, since the caged audit area is very crowded. This area is visible from the audit area and is covered by a camera. Lynda SZCZEPANIK stated that the longest time a cage would be in the rack area would be approximately three hours, until it is taken to the shipping area and then loaded (Enclosure 7). After discussing this request with Group Supervisor Joanne T. Chiavaro, this request was granted.

10. Internal Auditing: WALGREEN's management performs a mini DEA audit every quarter, randomly choosing one ARCOS item and one controlled substance to be audited.

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11. Loss or Theft: WALGREENS has had numerous thefts of controlled substances via UPS. DEA management has met with WALGREENS Loss Prevention management and UPS management concerning these thefts. The Investigators reviewed the DEA Forms-106. The company recently switched carriers from UPS to FedEx.

12. There are approximately 23,000 items in the warehouse, including controlled substances. The firm's management is considering leasing an unoccupied former Pratt-Whitney building nearby for future growth.

I. DISCREPANCIES AND DISCUSSION WITH MANAGEMENT

On 5/27/04, Investigators Gayle W. Lane and Janice Barnes held a closing discussion with Glenn HULTBERG, Operations Manager. The distribution center manager, Rob VARNO, was away. The Investigators discussed the controlled substances audit, the records used to conduct the audit, and the firm's security. No violations were uncovered.

INDEXING

1. WALGREEN CO. - [REDACTED]; DEA #RW0277752
2. VARNO, Robert M., AKA Rob - [REDACTED]
3. COUGHLIN, Daniel M., AKA Don - [REDACTED]
4. BERNAUER, David W. - [REDACTED]
5. REIN, Jeffrey A. - [REDACTED]; WALGREEN COMPANY President and COO
6. KARLIN, Jerome B. - [REDACTED]
7. EILERS, George C. - [REDACTED]; WALGREEN CO. Senior VP, Store Operations
8. LEWIS, J. Randolph - [REDACTED]; WALGREEN CO. Senior VP, Distribution and Logistics
9. OETTINGER, Julian A. - [REDACTED]; WALGREEN CO. Senior VP, General Counsel
10. ANNEY, Robert M. - [REDACTED]
11. EIDE, Daniel L. - [REDACTED]; [REDACTED], Maintenance Manager
12. FICO, Darrel - [REDACTED]; [REDACTED], Outbound Manager

REPORT OF INVESTIGATION <i>(Continuation)</i>	1. File No. [REDACTED]	2. G-DEP Identifier
	3. File Title WALGREEN CO 15998 Walgreens Drive Jupiter, FL 33478	
4. Page 16 of 16	6. Date Prepared 12/01/04	
5. Program Code		

13. HULTBERG, Glenn - [REDACTED]
Operations Manager
14. JONES, Kevin E. - [REDACTED]
15. KING, Stephen R. - [REDACTED]
16. KRAMER, Larry - [REDACTED],
HR Manager
17. DENIAKIS, Nick - [REDACTED]
18. HUTCHINSON, Sue - [REDACTED]
19. MONZOTE, Ricardo Jr. - [REDACTED]
20. SHIEBLER, Mary - [REDACTED]