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THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA, *ex rel.*
THOMAS C. HORNE, Attorney General,

Plaintiff,

vs.

MCKESSON CORPORATION,

Defendant.

No.

COMPLAINT

(Assigned to)

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I. INTRODUCTION

1. Plaintiff, the State of Arizona ("Plaintiff" or "State") by its Attorney General, Thomas C. Horne, brings this action pursuant to the Arizona Consumer Fraud Act, A.R.S. §§ 44-1521 to 44-1534.

2. Plaintiff brings this action against McKesson Corporation ("McKesson or "Defendant"), the largest national wholesaler of prescription drugs, for its involvement in a fraud to increase the published benchmark price ("Average Wholesale Price" or "AWP") of hundreds of brand name prescription drugs. McKesson's scheme involved the transmission and publication of false and misleading information used to determine the retail price of brand name drugs. As a result of McKesson's fraud, Arizona businesses, health plans and consumers paid millions of dollars of excess charges for brand name drugs.

II. PARTIES, JURISDICTION AND VENUE

3. Plaintiff is the State of Arizona, *ex rel.* Thomas C. Horne, the Attorney General of Arizona, who is authorized to bring this action under the Arizona Consumer Fraud Act, A.R.S. § 44-1521, *et seq.*

4. Defendant McKesson Corporation is a Delaware corporation with its principal place of business at McKesson Plaza, One Post Street, San Francisco, California 94101. McKesson claims to be the leading provider of pharmaceuticals, medical supplies and health care information technologies designed to reduce costs and improve quality across healthcare. Founded in 1833, with annual revenues of more than \$100 billion, McKesson ranks as the 14th largest industrial company in the United States. McKesson does business throughout the United States, including the State of Arizona.

1 5. This Court has jurisdiction to enter appropriate orders both prior to and
2 following a determination of liability pursuant to the Arizona Consumer Fraud Act,
3 A.R.S. §§ 44-1521 to 44-1534. ("Arizona Consumer Fraud Act").
4

5 6. Venue is proper in this District pursuant to A.R.S. § 12-401, because
6 Defendant transacts business in Maricopa County.

7 7. In this action, Plaintiff seeks injunctive relief, civil penalties, the costs of
8 litigation including attorneys' fees, and all other relief authorized by the Arizona
9 Consumer Fraud Act.
10

11 III. STATEMENT OF FACTS

12 A. Overview of Prescription Drug Pricing and Distribution System

13 8. Drug makers manufacture brand-name and generic drugs. Generally, a
14 drug product that is covered by a patent and thus is manufactured and sold exclusively by
15 one firm is a brand-name drug. Drug products not covered by patent protection and
16 produced and/or distributed by many firms are referred to as generic drugs.
17
18 Manufacturers tend to be either brand-name drug manufacturers or generic drug
19 manufacturers, although some manufacture both types of drugs.

20 9. There are approximately 65,000 branded and generic drug products in the
21 United States market, including different dosages or strengths of the same drug.
22
23 Prescription drugs are dispensed to patients primarily through four different drug
24 distribution channels: (a) retail pharmacies (including national chain pharmacies,
25 independent pharmacies, supermarket chains, and mail order pharmacies); (b) physicians
26 who administer the drug in an office; (c) home infusion (*i.e.*, drugs administered into the
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1 patient's bloodstream); and (d) other medical providers. This lawsuit primarily involves
2 branded drugs distributed through retail pharmacies.

3 10. Every drug intended for retail pharmacy sale is identified by an eleven-digit
4 National Drug Code ("NDC") that is listed with the United States Food and Drug
5 Administration ("FDA"). The NDC is used to identify the drug delivered to the patient.
6 This lawsuit involves more than 1400 NDCs. *See* Appendix A.
7

8 **1. The Wholesale Acquisition Cost**

9 11. Branded manufacturers arrive at an original launch price by taking into
10 account research and development costs, launch and marketing costs, competitor prices
11 and estimates of consumer and physician demand. Once an introductory price has been
12 set, the branded manufacturer establishes the wholesale acquisition cost, or "WAC,"
13 which is used as a baseline for sales to wholesalers (subject to many adjustments). The
14 WAC for branded drugs is then published by the manufacturer. In addition, wholesalers
15 sell branded drugs to retail pharmacies on the basis of the WAC.
16

17 12. The WAC is a publicly available price for most branded drugs. It is
18 typically reported on invoices between the manufacturer and the drug wholesaler. Some
19 drug manufacturers have other names for the WAC price such as manufacturer list price,
20 catalog price, direct price, wholesale net price, or book price. The WAC is the closest
21 reported price to the actual transaction price between a manufacturer and the wholesaler
22 or other direct purchaser of a drug product.
23

24 **2. Drug Wholesalers**

25 13. Wholesalers, especially national wholesalers, like McKesson, are drug
26 manufacturers' largest group of purchasers. For example, national wholesalers accounted
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1 for the distribution of 45.7% of prescription drugs sold in 2002. Wholesale drug
2 distribution is heavily concentrated. The three national wholesalers are Defendant
3 McKesson, Cardinal Health, Inc. ("Cardinal") and AmeriSource Bergen Corporation
4 ("ABC"). Each of these "Big Three" wholesalers has slightly less than one-third of the
5 national market of prescription drug wholesale distribution. Collectively, they account
6 for more than 80% of drug sales that flow through drug wholesalers (national, regional,
7 and specialty).

8
9
10 14. National drug wholesaling is generally perceived as price competitive, with
11 McKesson, Cardinal and ABC competing to supply retailers. As a result, drug
12 wholesaler margins to retailers tend to be thin, with a significant portion of national drug
13 wholesaler revenue instead being derived from prompt pay discounts received from
14 manufacturers and from wholesaler inventorying measures that anticipate price increases.

15
16 **3. Retail Pharmacies**

17 15. Retail pharmacies include chain drug store companies, independent
18 pharmacies, and supermarkets. Collectively, they comprise roughly two-thirds of the
19 estimated market share of dollars for prescription drugs. Typically, they purchase
20 prescription drugs based on WAC.

21
22 **4. Drug Price Publishers**

23 16. The distribution and sale of brand prescription drugs depends on accurate
24 and timely publication of the current AWP for every drug dispensed by retail pharmacies.
25 Health plan providers (both public and private) also rely on pharmaceutical pricing
26 publishers to accurately and fairly publish AWP's and WACs. Because electronic
27 publication offers quick access to updated pricing information and allowed for electronic
28

1 (and virtually automatic) claims processing, beginning in the 1990's the industry relied
2 almost exclusively on electronic publishers, *i.e.*, First DataBank ("First Data" or "FDB")
3 and Medi-Span, for the source of AWP's.

4
5 17. In 1998, through its parent Hearst Corporation, First Data merged with
6 Medi-Span to become the sole U.S. provider of integratable electronic drug data files, so
7 that it became the standard bearer and virtually every industry participant used and relied
8 upon the accuracy of WAC and AWP price fields data provided by FDB. After a lengthy
9 investigation, the Federal Trade Commission sued the Hearst Corporation and First Data
10 claiming, among other things, that the First Data and Medi-Span merger had been
11 unlawful. In late 2001, Hearst entered into a consent decree that required it to divest its
12 Medi-Span assets and to provide editorial services to the new owner of Medi-Span
13 (Wolters Kluwer), including price data for several years. Medi-Span's dependence on
14 FDB's price data lasted until about October 2004.

17 5. The Average Wholesale Price

18 18. Over the years, brand manufacturers have also caused average wholesale
19 prices ("AWPs") for prescription pharmaceuticals to be published. The AWP is a list
20 price used for invoices between drug wholesalers and pharmacies and is typically used as
21 a benchmark by insurers and other payors to reimburse retail pharmacies for dispensing
22 drugs to their insureds. The AWP is published by companies like First Databank, Inc.
23 and Medi-Span.

26 6. The WAC-to-AWP Spread

27 19. The percentage by which the AWP exceeds the WAC is commonly known
28 as the "mark-up" for a particular drug product.

1 20. The percentage difference between the mark-up and the AWP is known as
2 the "spread." For example, a drug with a 25% mark-up (for instance from a WAC of
3 \$100 to an AWP of \$125) has a spread (\$25 of the \$125 AWP) of 20%.

4 21. Although retailers *buy* pharmaceuticals from wholesalers like McKesson on
5 the basis of WAC, they *get paid* (*i.e.*, get reimbursed) for branded drugs based on the
6 benchmark commonly used for retail sales, *i.e.*, the *AWP*. As the difference between
7 AWP and WAC increases, the larger "spread" affords retailers opportunities for larger
8 profits.
9

10 22. For many years preceding the Scheme alleged in this Complaint, the WAC-
11 to-AWP mark-up for branded drugs had predictably-set patterns, and the competitive
12 pricing marketplace for pharmaceuticals had adjusted and accommodated for those
13 patterns. For branded pharmaceuticals, the WAC/AWP mark-up for a particular
14 manufacturer or brand-line tended to fall in two quantum places: 20% or 25%. If a
15 particular NDC first launched at a 20% mark-up value, that NDC would remain as a 20%
16 drug during the entire lifetime of that NDC, almost as if it were part of the genetic code
17 for that NDC. Thus, price changes to the WAC and AWP for a given drug moved in
18 parallel fashion (usually up), keeping the same mark-up factor associated with that NDC.
19
20 *Indeed, prior to the Scheme alleged in this case, it was extraordinarily rare for the*
21 *WAC/AWP mark-up to be changed for any particular NDC.*
22
23

24 23. Due to the *unchanging* nature of the WAC/AWP mark-up for a particular
25 NDC, these standard 20% and 25% WAC/AWP mark-up factors were commonly
26 associated by the pharmaceutical industry with particular divisions of pharmaceutical
27
28

1 companies. Prior to the Scheme, a pharmaceutical division would be known as a “20%
2 mark-up” company, while another company was known as a “25% mark-up” company.

3 **B. Drug Reimbursements are AWP-Based**

4 24. Consumers, health and welfare plans, health insurers, state Medicaid
5 agencies and other government prescription drug programs (“Payors”), who pay for
6 prescription drugs use and rely on AWPs in doing so. Virtually all third party Payors had
7 contracts with a network of pharmacies to dispense the brand-name drugs at issue to their
8 insureds and the contract prices for those drugs were based on AWPs.

9
10 25. In the private sector, drug benefit plan sponsors (who pay for part or all of
11 the cost of prescription drugs for their covered beneficiaries) include self-insured
12 employers, health and welfare plans, health insurers and managed care organizations.
13 Most of these plan sponsors reimburse retailers (for retailers’ drug purchase costs)
14 through pharmacy benefit managers. The vast majority of purchases are distributed
15 through the retail distribution channel.

16
17 26. The Medicaid Program, jointly financed through federal and state funds, is
18 the largest public payor in the United States. Designed to aid certain low-income people
19 and the disabled, it covers about 40 million individuals. Before 2012, nearly all States’
20 Medicaid agencies reimbursed pharmacies for brand name drugs based on AWP,
21 including the State of Arizona.

22
23 27. The AWP-based reimbursement benchmark for payments to retailers has
24 long been recognized. For example, at a hearing on December 7, 2004, before the United
25 States House of Representatives Committee on Energy and Commerce, a former Senior
26 Vice President of Aventis Pharmaceuticals, testified that “AWP has been codified as the
27
28

1 benchmark price, by statute and regulations, in the public sector and by contract in the
2 private sector.” And, as Defendant was aware, those paying for drugs, by statute or
3 contract, rely on and use the published AWP.¹
4

5 **C. The Market Conducive to the Scheme**

6 28. Each year more than three billion prescriptions are written in the United
7 States. The various market participants must have an accurate and timely way of
8 determining what the AWP is at any moment in time for the approximate 65,000 drugs
9 used in the marketplace. Industry participants rely upon pharmaceutical pricing
10 publishers to accurately and fairly publish AWP and WACs. Defendant was aware of
11 this reliance.
12

13 29. Traditionally, AWP were set by manufacturers and provided to publishers
14 and wholesalers.² Before the Scheme began in 2001, both First Data and Medi-Span
15 maintained the historical proportion between AWP and WAC when branded price
16 increases were announced. This enabled the publishers (when receiving, for example,
17 information only regarding WAC changes to a branded drug) to automatically calculate
18 the corresponding AWP. As a result, the marketplace had predictability, and
19 pharmaceutical end-payors operated on the belief that the AWP were the result of both
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23 ¹ Third-Party AWP-based reimbursement has also been acknowledged by Defendant.
24 For example, in a September 2001 e-mail from Bob James, McKesson’s Director of
25 Brand Pharmaceutical Production Management to his supervisor, McKesson Senior Vice
26 President Greg Yonko and others at McKesson, James internally noted that “it is
27 important to understand that the AWP that are used for third party reimbursement are the
28 First Data Bank (FDB) AWP.”

² MCKAWP 0084296; MCKAWP 0083898; MCKAWP 0067439; AZ0449836-
449850.

1 honest reporting by pharmaceutical companies and an empirical and professional analysis
2 undertaken by First Data or Medi-Span.

3 30. First Data promoted its pricing information as “accurate,” of “high-
4 quality,” and as “set[ting] the standard in the healthcare industry for comprehensive
5 coverage of descriptive, pricing and clinical information on drugs.” It also recognized
6 that its pricing information is “relied upon by professionals in th[e] industry,” and that,
7 *“[i]f to be useful to its audience, First Data’s data must be accurate and up-to-date.”*
8

9 Market participants – most notably pharmacies and the third-party payors that reimbursed
10 them – came to trust and rely upon First Data’s electronic publication of AWP for each
11 active NDC.
12

13 31. Government scrutiny and well-publicized AWP-related litigation in the late
14 1990s caused changes in AWP reporting practices. Many manufacturers stopped
15 providing AWPs.³ Some manufacturers even ceased providing First Data any price
16 information (AWP or WAC), making First Data increasingly dependent on wholesalers
17 for price information.⁴
18

19 32. First Data knew that the market widely relied upon its published AWPs and
20 that it played a crucial role as the most trusted supplier of such information. It also knew
21 that its preeminent position in the market would be at risk if it admitted that it did not
22 have a reliable basis for calculating AWPs. FDB publicly represented that it surveyed all
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24

25 ³ 6.28.07 Deposition of Patricia Kay Morgan, First Databank Editor (“Morgan Dep.”)
26 at 228:25-229:12.

27 ⁴ Morgan Dep. at 179:12-22; MCKAWP 0069640 (Morgan e-mail acknowledging that
28 FDB is missing manufacturers’ WACs, noting that FDB is authorized to obtain them
from wholesalers and requesting them from McKesson).

1 three of the major wholesalers (McKesson, Cardinal and AmerisourceBergen) to verify
2 the accuracy of the WAC to AWP markup on manufacturers' brand lines. But at least by
3 August 2001, when McKesson began its collusion with First Data, this representation was
4 no longer true. If First Data had been conducting regular surveys of each of the major
5 wholesalers before, it certainly was *no longer doing so* by August 2001. Both Cardinal
6 and AmerisourceBergen testified in related litigation⁵ that they did not participate in
7 FDB's survey.
8

9
10 33. Although FDB never actually admitted that it lied about the surveys,
11 documents produced by FDB confirm Cardinal and AmerisourceBergen's version of the
12 story. For example, notes from an internal First Data meeting on June 7, 2000 – over a
13 year before the Scheme began – confirm that Cardinal informed First Data that it did not
14 want to take part in its survey:
15

16 Steve is saying that Cardinal doesn't want to participate in
17 [First Data's] survey.⁶ Kay [Morgan] wants to continue to
include Cardinal. . . .

18 34. Although FDB's editor, Kay Morgan, testified that she could not recall
19 when it occurred, she conceded that Cardinal asked her to stop calling about pricing
20 information.⁷ She also admitted that the only markup information that she received from
21 Cardinal after that point was unrelated to the drugs that are the subject of this lawsuit, *i.e.*,
22 products that were not carried by any other wholesalers.⁸ There are no First Data survey
23
24

25 ⁵ *New England Carpenters Health Ben. Fund v. First DataBank, Inc.*, 05-cv-11148
(D. Mass.).

26 ⁶ FDB-AWP 028338 at 28340.

27 ⁷ 2007 Morgan Dep. at 49:4-6.

28 ⁸ *Id.* at 55:8-58:1.

1 documents from any time during the Scheme purporting to show Cardinal or
2 AmerisourceBergen (or its predecessors, Bergen and AmeriSource) participating in the
3 survey process. AmeriSource and Bergen merged in August 2001, which is also when
4 the McKesson and FDB's collusion began. In testimony, FDB admitted that during the
5 merger, acquisition, and subsequent layoffs of AmerisourceBergen employees, First Data
6 was not getting "sufficient information" from AmerisourceBergen.⁹

8 **D. The Mark-Up Scheme**

9 35. Around mid-2000, knowing that FDB relied on the mark-up wholesalers
10 apply on their projected retail prices, *i.e.*, suggested sell prices, to calculate the published
11 AWP, Defendant made a decision to stop calculating its suggested sales prices according
12 to the manufacturers' historic mark-up and instead to unilaterally adopt a higher mark-up.
13 Defendant did so in the hope that FDB would survey the artificial mark-up and increase
14 the published price. Both Cardinal and AmerisourceBergen testified that they wanted no
15 part in setting AWP prices and that they never considered using a standardized mark-up
16 of their own choosing. Their document production confirms that the mark-ups they
17 maintained on their suggested sales prices were based on the manufacturers' historic
18 mark-up.

19 36. McKesson's decision to adopt the higher mark-ups was not made as a
20 legitimate response to marketplace changes but as an artificial increase to benefit
21 McKesson and its customers. McKesson's customers included some of the largest retail
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28 ⁹ Nielson Dep. at 96:11-97:8.

1 chains in Arizona and the country, including: Albertsons, Costco, Eckerd, Long's Drugs,
2 Rite Aid, Safeway, Target, Wal-Mart, and Walgreens.¹⁰

3 37. With First Data purporting to use a survey of national wholesalers to
4 calculate AWP, McKesson recognized that it, the nation's largest wholesaler, had "an
5 opportunity to 'normalize' the AWP spreads on brand pharmaceuticals at a 25% mark-up
6 (or 20% spread)."¹¹ And if it were to succeed, "most [of its] customers would love it."¹²
7
8 Thus, Defendant changed its mark-ups "in hopes that if one of the other wholesalers
9 happens to raise their mark-up on an item (maybe due to pressure from retail customers),
10 and FDB happens to resurvey the items."¹³

12 **E. McKesson Raised its Internal Mark-ups in an Effort to Increase AWP**

13 38. As early as 2000, when the Scheme was hatched, McKesson began to
14 manipulate AWP by unilaterally imposing a 25% mark-up on its suggested sell price for
15 brand-name prescription drugs.¹⁴ At his deposition in the *Carpenters* class action
16 litigation against McKesson and First Databank, McKesson Vice President Greg Yonko
17 conceded that McKesson had increased the mark-up for its suggested sell prices with the
18 intent that FDB would use the higher mark-up to set AWP:
19
20

21 We are in business to support our customers, and we have
22 always supported our customers. And I believe that is what

23 ¹⁰ MCKAWP 0074408.

24 ¹¹ MCKAWP 0068514 (e-mail from James to Yonko and other McKesson employees).

25 ¹² *Id.* (MCKAWP 0068514).

26 ¹³ MCKAWP 0068514.

27 ¹⁴ MCKAWP 0057171; MCKAWP 0047807 ("Our mark up is not coming from our
28 suppliers. Suppliers [have] nothing to do [with] how we mark up our items. It is the Product Management team who make[s] the decisions on our mark up.").

1 Bob is talking about when he says we have attempted to raise
2 AWP's to support our customers, by changing our markup in
3 our system, going through the First DataBank survey process,
4 and hoping that, in fact, the AWP's will change.¹⁵

5 39. But when the other wholesalers did not join in on the price manipulation as
6 expected or First Data failed to "survey" the change as quickly as hoped,¹⁶ McKesson
7 decided to work directly with First Data to increase AWP's.

8 40. In 2002 Bob James was McKesson's Director of Brand Pharmaceutical
9 Production Management. He reported to his supervisor, Greg Yonko, Senior Vice
10 President for Purchasing. As documented in James' March 22, 2002 memo to Yonko,
11 McKesson began colluding with First Data to increase brand drug mark-ups as early as
12 August 2001:

13 After a discussion with FDB last August [2001], *we mutually*
14 *agreed* to standardize the Searle (16⅔% spread) product line
15 because it had been acquired earlier by Pharmacia (20%
16 spread). There seemed to be momentum in the industry to
17 move to a normalized markup of 25% on brand Rx products.
18 In December [2001], after several discussions with FDB
19 about our business efficiency improvement strategy we began
20 to move many of the manufacturers with mixed AWP spreads
(16⅔ and 20% products in the same line) to a consistent 25%
markup. These were companies like *GlaxoSmithKline, AstraZeneca, Aventis, Berlex, Bristol Myers Squibb, Merck, JOM, and 3M, Forest, Novartis, Roche, Schering and several others*. These were mixed product lines and we just set their Suggested Sell Prices at a consistent 25% markup.

21 ¹⁵ *Id.* at 41:8-14.

22 ¹⁶ *See, e.g.,* MCKAWP 0068514 ("McKesson chose to increase the markup on the
23 Parke-Davis line (Lipitor) [in January 2001] when Pfizer took them over. This was our
24 [McKesson's] attempt to raise the AWP's to support our customers. The other two
25 wholesalers did not do this. (I [Bob James, am told by FDB that the Parke-Davis
26 products from Pfizer will most likely have the AWP's increased to 20% this January
27 [2002] when price increases typically take place.... this will then be the same as the McK
28 figure." (ellipsis in original)). *See also* MCKAWP 0065883-84 (September 18, 2001
e-mail noting that "Amerisource has pointed out to some of our customers in the
Michigan market that we 'manipulate' AWP's on selected items," and that McKesson's
internal mark-ups for Lipitor and Advair were higher than FDB's or Cardinal's).

1 41. The March 22, 2002, memo's discussion of an agreement with First Data,
2 in or about August 2001, is also reflected in the September 18, 2001, e-mail between
3 James Yonko, which again refers to McKesson's recent "agreement with First Data Bank
4 on raising" Searle prices.¹⁷ The e-mail further reveals that the agreement was not limited
5 to a few major brands: "*We are talking with First Data Bank about 'normalizing' the*
6 *Brand AWP spreads at 20%* [*i.e.*, markups at 25%] because we believe it makes sense
7 for our customers."¹⁸ "Normalizing" was one of Defendant's euphemisms for increasing
8 mark-ups and ultimately AWP's. The October 9, 2001, e-mail between James and Yonko,
9 applauding "First Data Bank's willingness to *work with us* to normalize the brand
10 product AWP's,"¹⁹ further confirms that McKesson and FDB agreed to increase the
11 mark-up on all brand name prescription drugs that did not already have the 25% mark-up.
12 The Scheme, which continued well into 2004²⁰, expanded to cover all brand name
13 drugs.²¹

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18 ¹⁷ MCKAWP 0065885. Nor can there be any doubt that First Data was aware that the
19 mark-up information that McKesson provided was made up from whole cloth. In
20 addition to the preceding documents referring to discussions with First Data about its
21 normalization plan, the record also reveals that McKesson sent First Data a copy of its
22 internal memo, titled "AWP Discussion," in which it stated: "McKesson has chosen to
23 'normalize' the markups in the Brand Rx area resulting in a consistent 25% markup or
24 use of a 1.25 factor. This serves to level the playing field"; "customers may potentially
25 benefit because this process provides the opportunity for increased profitability if
26 managed care contracts remain as they are today."; MCKAWP 0069611.

27 ¹⁸ MCKAWP 0065885 (emphasis added).

28 ¹⁹ MCKAWP 0068599 (emphasis added).

²⁰ See, e.g., MCKAWP 0070967 (e-mail from McKesson to FDB asking whether
Prilosec over-the-counter could be considered like the prescription product with a 25%
markup).

²¹ See, e.g., MCKAWP 0069615.

1 42. While the memo invokes the survey process, First Data's express
2 agreement to raise the mark-up on Searle products is inconsistent with the use of a survey
3 to ensure the appropriate mark-up. More fundamentally, McKesson's "business
4 efficiency improvement strategy," *i.e.*, the goal of achieving harmony between its
5 uniform 25% mark-up and FDB's data, could only be achieved if FDB agreed to
6 disregard contrary input from other industry sources and to override historical mark-ups.
7

8 43. Indeed, it was McKesson's Manager of Business Information Services,
9 Erlinda Thomas' understanding at the time that she wrote the following March 14, 2002,
10 e-mail that McKesson dictated the price changes to FDB:
11

12 Product Management is working closely with FDB to adjust
13 their mark up. FDB [has] been changing their mark up to
14 match with our mark up. Eventually our list price will [be]
equal to FDB's AWP.²²

15 44. John Bonner, Defendant's Director of Brand Rx Product Management and
16 Finance, also represented that it was McKesson's normalization plan and not a survey
17 process that was the driving force behind the changes.²³

18 45. The existence of McKesson's and FDB's agreement and concerted action is
19 found not only in the foregoing excerpts from McKesson's internal documents, but in the
20 parties' communications and subsequent conduct, which clearly demonstrate that the
21 AWP survey process had given way to the mark-up Scheme. Many of the
22 communications between First Data and McKesson about manufacturer mark-ups were
23
24

25 ²² MCKAWP 0042664; 3.13.07 Deposition of Erlinda Thomas at 109:6-110:7
26 (testifying that she believed that the statement was true at the time she wrote it). As
27 McKesson's Manager of Business Information Services Ms. Thomas was in charge of
data integrity for McKesson's price and drug information database. *Id.* at 8:1-17.

28 ²³ MCKAWP 0066464; MCKAWP 0042663; MCKAWP 0076289.

1 initiated by McKesson, not First Data, and they do not discuss a survey. For example, on
2 November 9, 2001, Bob James wrote to Kay Morgan, FDB's editor:

3 Hello Kay Just went through the Merck items and
4 updated a couple of our items to 25% markup. However,
5 found some items that you might want to review. They
6 include Noroxin's, Prinivil and Prinzide's. The latter two,
should probably be consistent with the new AZ 1.25
markups.²⁴

7 46. On other occasions, Bob James also gently reminded First Data to raise
8 AWP's on certain brands:

9 Hello Kay, this note is from BMS [Bristol-Myers Squibb] and
10 is basically saying that FDB shows BMS at a 20.5% mark up
11 while McKesson is showing a 25% mark up. I am assuming
12 that they are looking at current information and I thought we
took care of this several weeks ago. Ain't it Great.²⁵

13 * * *

14 Rite Aid called this morning complaining about the Diamox
AWP. Just wondered if you had a chance to get to it yet?²⁶

15 * * *

16 We're catching some flack from some of our large retail
17 friends about the Wyeth products that were sold to Barr ... Of
18 course, we raised the prices on both NDC's for consistency,
... See if it makes sense to you that both NDC's should carry
the new price.²⁷

19 * * *

20 Good morning

21 We've had a couple of inquiries from the field asking us to
22 correct our AWP's. J&J and one of the other wholesalers are
23 saying that the McKesson AWP's are incorrect. We have
24 them marked up 25% like the rest of the J&J line. When you

25 ²⁴ MCKAWP 0068621.

26 ²⁵ MCKAWP 0069586.

27 ²⁶ MCK 0001168.

28 ²⁷ MCKAWP 0070781.

1 have a minute, would you verify that our file matches the
2 FDB file.²⁸

3 47. An e-mail from McKesson Data Management Analyst, Pia Castillo, dated
4 January 23, 2002, also confirms:

5 *AstraZeneca, Aventis, Bristol Meyers, GlaxoSmithKline,*
6 *JOM, etc.* These vendors are now at a 25% markup instead
7 of 20%. Bob James is in contact with FDB in regards to
8 adjustment of their AWP pricing.²⁹

9 48. Notably, the McKesson e-mails, which were contemporary with the mark-
10 up increases, do not refer to a survey process, and there are no FDB documents
11 purporting to show that the changes to these manufacturer mark-ups were made as a
12 result of a wholesaler survey.

13 49. Similarly, in McKesson's Monthly Status Report, Rx Brand Product
14 Management, General Overview October 2002, James reports:

15 We have had some recent success in getting some AWP
16 issues resolved by requesting that new surveys be done on
17 Celexra and Clarinex. Both items had AWP spreads
18 increased to 20% from 16 2/3% last month. This is a huge
boost in profitability for our retail customers. We are
working on getting some adjustments done on Lilly and Novo
Nordisk products (insulin).³⁰

19 And indeed it happens. On December 3, 2002, Kay Morgan orders her assistant to
20 change the mark-up on E.I. Lilly to 25%. There is no mention of a survey to instigate the
21 change.³¹ The change to Novo followed close behind. On December 19, 2002, Morgan

22
23 ²⁸ MCKAWP 0001188. Kay Morgan responded: "We are in sync. Janssen still
24 suggests [sell price] on some items and perhaps this is one but as you know Manufacturer
25 suggested is not the same as AWP. Don't know who is complaining (Janssen?) but FDB
and McKesson match."

26 ²⁹ MCKAWP 0081250 (emphasis added).

27 ³⁰ MCKAWP 0066192.

28 ³¹ FDB/NEC 015451. On the contrary, earlier that year Lilly had complained to
FDB's CEO and COO that FDB was manipulating AWP's. MCKAWP 0068863.

1 e-mails James: "FYI – Novo[is] going to 1.25 today. Can't have their products at 1.2
2 and Lilly at 1.25."³²

3 50. Likewise Kay Morgan responded to an e-mail from Bob James asking
4 whether Prilosec over-the-counter could be considered like the prescription product with
5 a 25% mark-up: "Thanks and we have you covered."³³

6 51. And in response to James' inquiry about whether First Data had a 25%
7 mark-up on some of J&J's product lines, Morgan responded: "We are in sync."³⁴

8 52. Other exchanges also demonstrate that McKesson and FDB worked closely
9 to change the mark-ups for brand drugs industry-wide. For example, without any
10 explanation, Kay Morgan forwards to Bob James an internal First Data e-mail advising
11 that First Data was moving Reliant to a 25% mark-up.³⁵ Also when Morgan's assistant,
12 Alisha Nielson, e-mails Bob James to request a mark-up for Enzon and copies her,
13 Morgan responds before James even has a chance to answer:
14
15

16 Go ahead and put them on 1.25 times WAC.
17 Thanks,
18 Kay³⁶

19 53. Similarly, the following exchange between McKesson and FDB led to
20 increased mark-ups for Lexapro and Celexa:

21 [McKesson] Question: Is Forest's new Lexapro at 1.25? and
22 we still have Celexa at 1.20. The retail customers would love
23 to have that one changed. Please advise. Thank you.³⁷

24 ³² MCKAWP 0069553.

25 ³³ MCKAWP 0070967.

26 ³⁴ MCKAWP 001188.

27 ³⁵ MCKAWP 0069782.

28 ³⁶ FDB/NEC 032733.

1 [FDB] Lexapro & Celexa by Forest are still at the 1.20xW
2 markup. *We will change this as directed*, unless Kay objects.
3 I will speak with her about this. She is in a meeting right
4 now.³⁸

5 **F. The Purpose of McKesson's Mark-Up Scheme Was to Increase its Pharmacy**
6 **Customers' Profits**

7 54. In many of its internal communications McKesson candidly admitted that
8 the change was made to increase its customers' profit margins.³⁹ For example,
9 McKesson's John Bonner, Director of Brand Rx Product Management and Finance,
10 observed: "There's been a great deal of activity of late, by McKesson, to increase AWP's
11 on brand items to a uniform 25%. *That helps the pharmacy profitability greatly.*"⁴⁰

12 Reflecting on his achievements as of April 2003, Bob James noted:

13 We played a major role (and still do) in normalizing the
14 AWP's on Brand Pharmaceuticals from 16 2/3% to 20%
15 spreads [i.e., 20 to 25% markups]. This has had a huge
16 impact on the profitability of our customers on their insurance
17 based business (which is about 90% now). To summarize this
18 impact, it's the same as lowering their cost of goods 3 1/3% on
19 70% of the brand drugs. Historically, 75% to 80% of brand
20 pharmaceuticals carried a 16 2/3% AWP spread and the
21 remaining, a 20% spread. Today, almost 95% of brand drugs
22 carry a 20% spread. This has provided millions of dollars in
23 improved profits across our industry.⁴¹

24 Another McKesson employee explained:

25 I received a response to an e-mail last week from John
26 Bonner. He mentions that McK is working to increase the
27 spread on AWP to a uniform 25% on branded Rx. One of the

28 ³⁷ FDB/NEC 040006.

³⁸ FDB/NEC 040006 (emphasis added).

³⁹ See, e.g., MCKAWP 0042664; MCKAWP 0065592; MCKAWP 0065885;
MCKAWP 0066191-92; MCKAWP 0066464; MCKAWP 0068131; MCKAWP
0069594; MCKAWP 0069607; MCKAWP 0069615; MCKAWP 0071670; MCKAWP
0084327; MCKAWP 0084485.

⁴⁰ MCKAWP 0050602 (emphasis added).

⁴¹ MCKAWP 0065592.

benefits of this will increase reimbursements to our customers from third parties.⁴²

Yet another McKesson employee reported: "What Bob explained to me a few months ago is we (mckesson) [sic] are working to 'expand' the margin between AWP and cost."⁴³ An internal memo discussing the mark-up changes states:

Here are a few examples of increased profits that our customers should be realizing now and into the future. The following results are based on a reimbursement formula of AWP minus 15% plus a \$2.00 fee.

Old 16 $\frac{2}{3}$ % spread New 20% spread

Lipitor 20 mg 90's	\$6.86	\$17.18
--------------------	--------	---------

Prilosec 20 mg 30's	\$4.22	\$8.92
---------------------	--------	--------

Allegra 60 mg 100's	\$3.97	\$8.16
---------------------	--------	--------

Advair Discus 500/50

60 dose	\$5.11	\$11.70
---------	--------	---------

Betasteron (previously

a flat \$7.00 fee)	\$20.00	\$58.25
--------------------	---------	---------

Most would agree that these improvements are extremely significant.⁴⁴

55. Another internal e-mail from James to Yonko and others at McKesson demonstrates the same understanding:

Some of our friends in retail that I have spoken with are pretty overwhelmed *that we would be 'driving' this process on their behalf*. Of course, we are not solely responsible for this 'normalizing' of AWP's but we have done our part as I

⁴² MCKAWP 0066465-66.

⁴³ MCKAWP 0069732.

⁴⁴ MCKAWP 0069609.

1 have discussed with you previously. I have had conversations
2 with Albertsons and Safeway and a few others.⁴⁵

3 56. McKesson was proud of its efforts and discretely boasted to select retail
4 clients that McKesson "had been working on AWP expansion with some success."⁴⁶
5 Internally James noted that clients were "very glad that McKesson was doing this."⁴⁷
6 Confirming the secrecy of the Scheme, he cautioned that McKesson's "AWP expansion
7 effort" and information about its role in inflating AWP is "NOT INTENDED to be
8 handed out to customers" but could be described to show "McKesson is doing our
9 part."⁴⁸ "AWP expansion," like AWP "normalization" was McKesson's euphemism for
10 the WAC-to-AWP price fix.
11

12 57. For example, in a March 22, 2002 memo to Yonko, James reports that "[i]n
13 January of 2001 when Pfizer (20% spread [*i.e.*, 25% mark-up]) officially took over
14 Parke-Davis (16 2/3% spread [*i.e.*, 20% mark-up]) we called Pfizer and asked what their
15 position was relative to Parke-Davis spreads."⁴⁹ McKesson "huddled and made the
16 decision to change all Parke-Davis products to a 25% mark-up to match the Pfizer
17 products. This meant that our Suggested Sell prices for both product lines used the 25%
18 mark-up. This had no immediate impact on the AWP. However, 12 months later when
19 the next price increase was expected, FDB resurveyed the line and this resulted in
20
21
22
23

24 ⁴⁵ MCKAWP 0065895 (emphasis added).

25 ⁴⁶ MCKAWP 0069726.

26 ⁴⁷ MCKAWP 0069726.

27 ⁴⁸ MCKAWP 0069732 (emphasis in original).

28 ⁴⁹ MCKAWP 0069608.

1 increased AWP's on all of the Parke-Davis products[.]”⁵⁰ The impact of McKesson's
2 price change was huge as it included the world's top-selling drug – Lipitor.

3 58. McKesson documents also report that Bob James called Kay Morgan in
4 early 2002 “on behalf of VitaRx on Avonex and Copaxone” and reported that the call
5 “resulted in a \$500K profit improvement for VitaRx,” and “FYI. Kay Morgan, FDB
6 confirmed today that this had been done.”⁵¹

7 59. Other communications do refer to a survey process, but they generally
8 betray McKesson's expectation that the alleged survey process will merely confirm
9 McKesson's 25% mark-up. For example, an e-mail dated February 15, 2002, from Bob
10 James states:

11 What we are seeing is a ‘normalizing process for the brand
12 Rx items. As you know, suppliers do not set AWP,
13 wholesalers do not set AWP, and neither does FDB.
14 Wholesalers set their individual markups or Suggested Sell or
15 List Price as in the case of McKesson. I am not sure what the
16 other wholesalers call their sell price. This is done
17 independently. FDB takes a survey of at least three national
18 wholesalers and if 2 out of 3 are at a 25% markup, then that
19 becomes the AWP ... I think it is very positive for the
20 industry and most people will be delighted when they
21 understand what is going on and how the process works.”⁵²

22 He then predicts: “*In a few months I would expect to see most brand products at a 25%
23 markup.*”⁵³ Given that McKesson is advocating a 25% mark-up in a predominantly 20%
24 market where such mark-ups have remained largely unchanged for years, James’
25 expectation of widespread change – let alone such change over a matter of months – is

26 ⁵⁰ *Id.*

27 ⁵¹ MCKAWP 0069615; *see also* MCKAWP 0084327.

28 ⁵² MCKAWP 0069590; MCKAWP 0069591.

⁵³ MCKAWP 0069592 (emphasis added).

1 simply not comprehensible unless he also believed that FDB was complicit in
2 McKesson's Scheme.

3 60. This inference is further supported by the statement he makes on
4 February 26, 2002, that he is simply waiting for FDB to "catch up" to McKesson's mark-
5 ups and that he has been told by FDB that these changes, and the higher AWP's they
6 entail, are imminent:
7

8 The McKesson Sugg Sell or List Prices for Brand Rx will
9 remain at the 25% markup, however. *We expect the FDB*
10 *AWP's to catch up over the next month or so as things*
11 *normalize in the industry.* I was not aware until last week
12 that our BIS group was changing the AWP field to match or
13 Sugg Sell or List Price field in the DITM before First Data
14 Bank actually made the changes. *We have been told by FDB*
15 *that the items were going to move up but there obviously*
16 *have been some timing issues.* It's my fault, I guess I did not
17 communicate very clearly. There will be no changes to the
18 FDB AWP field unless the information comes by electronic
19 download from FDB.

20 When the changes do occur, there will be a slight time delay
21 for our system to be changed. More importantly, there will
22 most likely be a longer time delay for the third parties to pick
23 up and input *the new higher AWP's.*⁵⁴

24 61. A month later, James' confirms for Yonko his expectation that FDB has
25 changed the mark-ups on the majority of brand manufacturers:
26

27 I am told by FDB that 90% of the Brand Rx companies are
28 now listed as 1.25 factor or 25% markup companies. Not all
products in these companies have had AWP increases at this
point in time. However, as price increases occur FDB⁵⁵ will re-
survey those products and make their determination.

29 In light of McKesson's confidence that FDB's AWP's will "catch up" to McKesson's
30 Suggested Sell or List Prices in short order, this statement indicates that by "survey"
31 James does not mean an objective determination of the prevailing mark-up among the

32 ⁵⁴ MCKAWP 0057428.

33 ⁵⁵ MCKAWP 0069609.

1 national wholesalers, but merely the application of the agreed-upon 25% mark-up to the
2 NDCs whose WAC price was increased by the manufacturers.

3 62. In an e-mail, dated April 25, 2002, re "AWP Situation Status." James
4 advised Greg Yonko of the progress of the Scheme:

5 The following is a summary of activity on the subject of
6 AWP:

- 7 1. There is a movement in the industry to normalize the
8 brand Rx markup at 25% to create a 20% AWP spread.
- 9 2. 90% of vendors have been moved to a 1.25 markup factor
10 at FDB.
- 11 3. Actual AWP changes have been occurring around price
12 increases and FDB re-surveying the market.
- 13 4. We are working with FDB to improve "their accuracy" on
14 WAC pricing because ours is extremely accurate.
- 15 5. ... We will be sharing information with FDB on WAC
16 price changes in order to make us both more accurate.
- 17 6. McKesson has had no new proactive changes since last
18 February except as noted above with Avonex and Copaxone.

19 * * * *

- 20 9. All new brand vendors will be set up as 1.25 markup
21 factor vendors, *both at McK and FDB.*⁵⁶

22 While the McKesson e-mail refers to a survey process, it also refers to FDB's agreement
23 to raise the mark-ups for Avonex and Copaxone – without the benefit of a survey, and
24 there is no pretense of a survey for new manufacturers. Their mark-up is set by fiat: "All
25 new brand vendors will be set up as 1.25 mark-up factor vendors, both at McK and
26 FDB."⁵⁷ Additionally, at least for "about 90% of the vendors," the alleged survey

27 ⁵⁶ MCKAWP 0069615 (emphasis added).

28 ⁵⁷ See also FDB/NEC 040006 (e-mail from McKesson to FDB: "Any new brand
pharmaceuticals will be added at 1.25 going forward.").

1 process is perceived as simply a means of applying the pre-determined mark-up "as price
2 increases occur."⁵⁸

3 63. Many of the communications from First Data are also more consistent with
4 an agreement to change AWP than an objective survey to determine what it should be.
5 For example, on April 1, 2002, Alisha Nielson, Kay Morgan's assistant at First Databank,
6 e-mailed Bob James to "please provide me with your mark-up for Endo."⁵⁹ James
7 responded that McKesson used a 25% mark-up, and moments later, without any
8 indication that she had received (or even requested) responses from other wholesalers,
9 Alisha Nielson forwarded his response to her co-worker, Inna Dimitshteyn, with the
10 instruction: "Please change the mark-up for Endo to 1.25 WAC."⁶⁰
11
12

13 64. Soon after this exchange, Seattle-based retail pharmacy Bartell e-mails
14 McKesson with the subject line "Low AWP companies" to complain about a low mark-
15 up for Galderma.⁶¹ James responds with the subject line, "See, we listen":
16

17 Celexa and Lexapro will have an AWP markup of 25% or a
18 spread of 20% as soon as FDB information is updated. Look
19 for a change to happen next week.

19 Keep smiling[g] . . . and who said we never listen to our
20 customers (and old friends).⁶²

21 65. Also consistent with advancing the Scheme, McKesson conducted weekly
22 reviews of First Data's AWP's.⁶³ In April 2002, James forwarded one of McKesson's
23 comparison files to Kay Morgan, asking her to
24

25 ⁵⁸ MCKAWP 0042663.

26 ⁵⁹ FDB/NEC 031778.

27 ⁶⁰ *Id.*

28 ⁶¹ MCKAWP 0069819.

⁶² MCKAWP 0069817.

1 let me know if you think this type of information is useful and
2 also if you need additional information. *We should be*
3 *enthused about how good this is looking.* Thank you for all
4 your cooperation. We can get similar information on the rest
of the file that would include generics and OTC/Home
Healthcare but for now I would like to focus on the brand
products[.]^{64]}

5 Morgan replied: "It's a start. ... I agree, brand comes first."⁶⁵

6 **G. McKesson and FDB Concealed the Mark-Up Scheme**

7 66. To draw attention away from the mark-up increases, McKesson and First
8 Data agreed to typically effectuate price changes only when some other WAC-based
9 price announcement was made by a drug manufacturer. This camouflaged the associated
10 increase in the WAC-to-AWP mark-up and WAC-to-AWP spread and also kept
11 McKesson's identity as the source of the increased mark-up a secret.
12

13 67. Until it made the announcement on March 15, 2005, that it would no longer
14 survey wholesalers to calculate AWP, First Data publicly represented, with McKesson's
15 knowledge, that it derived the WAC mark-up that establishes the AWP either from
16 manufacturers or by conducting "a survey" of wholesalers whose purpose was to verify
17 prices reported by the manufacturer. FDB further represented that AWP represents the
18 "average of prices charged by the national drug wholesalers," and that the number of
19 surveys it was conducting to determine the published AWP was "increasing."
20
21

22 68. And publicly, throughout the 2001-2005 period, FDB falsely represented
23 that its surveys were "performed with all national wholesalers to determine the
24

25 ⁶³ MCKAWP 0042663.

26 ⁶⁴ MCKAWP 0069617 (emphasis added).

27 ⁶⁵ MCKAWP 0069640. Over the course of the Class Period, McKesson forwarded
28 several of its AWP comparison files to FDB. *See, e.g.*, MCKAWP 0069717; MCKAWP
0070784; MCKAWP 0070826; and MCKAWP 0070928.

1 appropriate AWP.”⁶⁶ Evidence also suggests that McKesson and First Data agreed,
2 whether explicitly or implicitly, to perpetuate the myth of the objective survey process as
3 a means of covering their Scheme. For example, after FDB had already agreed to raise
4 the mark-up on Schering products,⁶⁷ James forwarded an e-mail from Schering asking for
5 McKesson’s help in raising FDB’s mark-up on Clarinex so that it could remain
6 competitive with Claritin⁶⁸ – another of the drugs that were increased as a result of the
7 Scheme: “Even the Schering folks would like to see the AWP raised on Clarinex. Last
8 time I spoke with Chuck, *I gave him the standard response about process.*”⁶⁹
9
10

11 69. In a February 21, 2002, e-mail discussing McKesson’s efforts to increase
12 AWP’s, McKesson’s John Bonner closed with the admonition: “I’m not sure it is
13 something we want discussed. Please contact him before discussing outside the
14 company.”⁷⁰
15

16 70. McKesson knew that if it did not keep its manipulations of the AWP’s a
17 secret, there would be serious repercussions:

18 Confidentially. Not to pass on. We have [only] about 470
19 brand Rx items where McK and FDB AWP’s do not
20 match....⁷¹

21 [Bob James, discussing McKesson’s efforts to raise AWP’s:]
22 For obvious reasons we don’t want to write a memo and send
it out because it would not be kept confidential.⁷²

23 ⁶⁶ See, e.g., FDB-AWP 02023; FDB-AWP 02005.

24 ⁶⁷ See MCKAWP 0069818.

25 ⁶⁸ MCKAWP 0069857.

26 ⁶⁹ MCKAWP 0069857.

27 ⁷⁰ MCKAWP 0066464-65.

28 ⁷¹ MCKAWP 0068889.

⁷² MCKAWP 0069591.

1 [James, responding to McKesson field associate's request to
2 share information about McKesson's efforts with her
3 customers:] I would be careful You be the judge on how
4 your customer will interpret.⁷³

5 [McKesson field associate writing to John Bonner:] My
6 accounts are having many issues with us 'Normalizing brand
7 pricing at 25%' You also mentioned that we should not
8 discuss [this] outside of McKesson, how would you suggest
9 we answer our customers['] questions?⁷⁴

10 [James, signaling to McKesson employees that they should
11 not state in writing that McKesson changed its markups to
12 improve its customers' profitability:] Remember,
13 **"McKesson is doing this to improve our inefficiencies in
14 our BIS group."** With mixed AWP spreads, our BIS group
15 is required to make manual overrides (for every pricing
16 activity) to input the First Data Bank AWP whenever there is
17 a difference from our Suggested Sell or List Price. It could be
18 stated as a benefit of the Sixth Sigma method of identifying
19 defects. An "unintended consequence" is that the profitability
20 of our customers will be impacted in a positive way. They
21 will basically get 3 1/3% more profit on Rx's filled with this
22 new AWP spread. (Just imagine what this would mean on
23 drugs like Lipitor or Prilosec.) [boldface in original]⁷⁵

24 71. And First Data also knew the importance of keeping the Scheme a secret.

25 In response to an e-mail inquiry about whether electronic drug pricing publishers were
26 increasing the WAC-AWP spread, Kay Morgan denied any involvement and brandished
27 the false "survey" defense: "I am most curious as to the source of this rumor. First Data
28 Bank has always used a wholesaler survey to determine AWP."⁷⁶ She forwarded the
exchange to Bob James at McKesson, stating, "Thought you might want to see my
answer," to which he responds: "I love it! You are the best."⁷⁷

25 ⁷³ MCKAWP 0069592.

26 ⁷⁴ MCKAWP 0066464.

27 ⁷⁵ MCKAWP 0065895 (emphasis in original).

28 ⁷⁶ MCKAWP 0069588.

⁷⁷ *Id.*

1 **H. McKesson's Public Position was that AWP's were Determined by Manufacturers'**
2 **Historic Mark-Ups and not by McKesson**

3 72. In January 2002, McKesson organized an upper-management "meeting to
4 discuss McKesson's position regarding Average Wholesale Price."⁷⁸ Both Bob James
5 and Greg Yonko attended the meeting,⁷⁹ which took place on or about January 16,
6 2002.⁸⁰ Among the topics discussed were "how different reimbursement models or
7 change in reimbursement models might look,"⁸¹ and "the legislative momentum
8 surrounding the issue of Average Sale Price vs. Average Wholesale Price vs. Wholesale
9 Acquisition Costs (WAC) and the complexities and potential implications to our
10 customers of any such changes, and eventually to our company [McKesson]."⁸²

11 73. At the meeting, it was agreed that Greg Yonko and Jeff Herzfeld, Senior
12 Vice President of Pharmaceutical Product/Pharma Finance, would "develop a position
13 statement" that could be used to "communicate throughout our management team so that
14 we are on all on the same page, so-to-speak, when discussing such issues with our
15 customers, suppliers, and any legislative types."⁸³

16 74. Yonko circulated a draft of the official McKesson position, which defined
17 AWP as a suggested retail price set by manufacturers' historic mark-ups and not
18 established by McKesson. According to this official position, McKesson did not meddle
19 with the manufacturer-set AWP carried in its system and only adjusted the price if there
20 with the manufacturer-set AWP carried in its system and only adjusted the price if there
21 with the manufacturer-set AWP carried in its system and only adjusted the price if there
22 with the manufacturer-set AWP carried in its system and only adjusted the price if there
23 with the manufacturer-set AWP carried in its system and only adjusted the price if there
24 with the manufacturer-set AWP carried in its system and only adjusted the price if there

25 ⁷⁸ MCKAWP 0065896.

26 ⁷⁹ *Id.* at 85:22-86:2; MCKAWP 0084295.

27 ⁸⁰ 5.15.07 Yonko Dep. at 87:8-11.

28 ⁸¹ *Id.* at 89:10-12.

⁸² MCKAWP 0084295.

⁸³ MCKAWP 0084295.

1 was a pricing action, that is, if the manufacturer changed its WAC.⁸⁴ And McKesson
2 represented that it understood First Data to publish the AWP consistent with the
3 manufacturers' historic mark-up.⁸⁵

4
5 75. Notably, this policy, which was intended for public consumption, did not
6 refer to McKesson's participation in wholesaler surveys of AWP or state that AWP was
7 in any way affected by a wholesaler pricing policy.⁸⁶ To the contrary, McKesson
8 expressly disavowed *any involvement* in determining mark-ups.⁸⁷

9
10 **I. The Mark-up Scheme was a Success**

11 76. Reflecting on his achievements as of April 2003, Bob James noted:

12 We played a major role (and still do) in normalizing the
13 AWP's on Brand Pharmaceuticals from 16 2/3% to 20%
14 spreads [i.e., 20 to 25% markups]. This has had a huge
15 impact on the profitability of our customers on their insurance
16 based business (which is about 90% now). To summarize this
17 impact, it's the same as lowering their cost of goods 3 1/3% on
18 70% of the brand drugs. Historically, 75% to 80% of brand
19 pharmaceuticals carried a 16 2/3% AWP spread and the
20 remaining, a 20% spread. Today, almost 95% of brand drugs
21 carry a 20% spread. This has provided millions of dollars in
22 improved profits across our industry.⁸⁸

23
24 77. The dramatic nature of the mark-up Scheme is illustrated by the following
25 chart depicting the hundreds of drugs whose WAC-to-AWP mark-up was raised as part
26 of the Scheme. The spike in 2002 reflects implementation of the mark-up Scheme:

27 **J. Number of NDCs with Mark-up Change from 20% to 25% Jan. 1999 - Oct 2004**

28

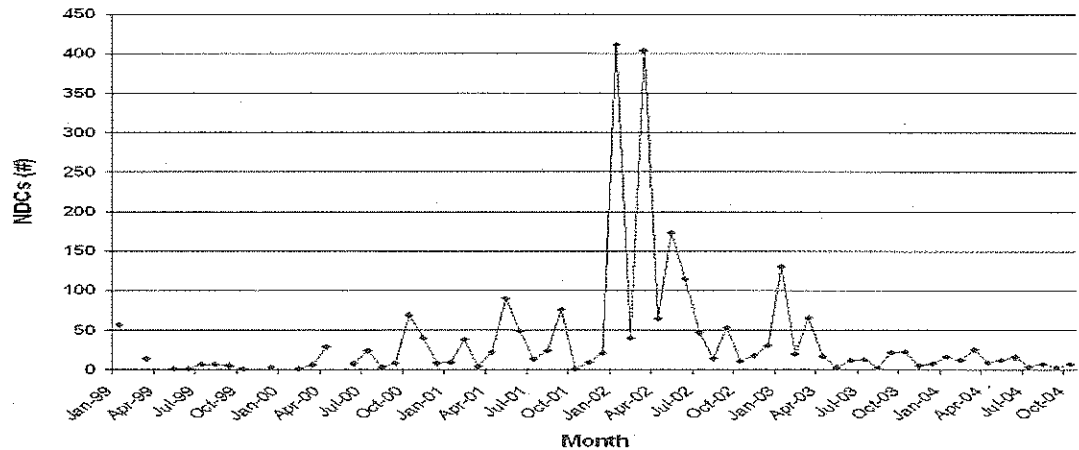
⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ "The markup ... is for the most part determined by historical spreads from the
manufacturer (not by McKesson). *Id.*

⁸⁸ MCKAWP 0065592.



78. Among the drugs whose prices were artificially inflated by the Scheme are some of the top brand-name drugs used by hundreds of millions of Americans, such as: Allegra (a leading allergy drug), Azmacort (a leading asthma drug), Celebrex (a leading arthritis/pain medicine), Coumadin (a leading anti-coagulant), Flonase (a leading asthma drug), Lipitor (the world's top selling drug, a statin), Neurontin (a leading pain medication), Nexium (a leading reflux drug), Prevacid (a leading ulcer/reflux drug) and Valium.

79. Given the billions of dollars spent on prescription drugs annually, a 5% increase in the WAC-to-AWP mark-up results in a substantial increase in payments for pharmaceuticals. For example, AstraZeneca's Nexium had annual sales in 2004 of almost \$4 billion. A bump of 5% in the WAC-to-AWP mark-up results in an increase of over \$100 million per year in reimbursements for just one drug. Another such drug is Pfizer's Lipitor, whose annual sales in 2004 exceeded \$10 billion. As a result of the 5% increase imposed by First Data and McKesson, Arizona consumers spent millions more on Lipitor than they would have, absent the Scheme.

1 80. McKesson documents also report that Bob James called Kay Morgan in
2 early 2002 “on behalf of VitaRx on Avonex and Copaxone” and reported that the call
3 “resulted in a \$500K profit improvement for VitaRx,” and “FYI. Kay Morgan, FDB
4 confirmed today that this had been done.”⁸⁹ After the call, James circulated an e-mail:

6 Just a note to let everyone know that “I am told” that the
7 markup on Avonex and both the old and new sku’s of
8 Copaxone will be changed to 25% (to create a 25% spread on
9 WAC/AWP) next week.... Yes!!”

10 This should make a significant contribution to your
11 profitability as illustrated by the following example using a
12 reimbursement of AWP – 15% plus \$2.00 fee.

13 Avonex at 16 $\frac{2}{3}$ % spread, profit would be \$18.42 ... and now
14 at a 20% spread, profit would be \$51.31 ... not bad!

15 This is an increase of \$32.89 per script.

16 Copaxone at 16 $\frac{2}{3}$ % spread, profit would be \$19.72 ... and
17 now at 20% spread, profit would be \$57.39 ... pretty good!

18 This is an increase of \$37.67 per script.⁹⁰

19 **K. McKesson Also Benefited From the Scheme**

20 81. McKesson benefited from the Scheme because it was able to demonstrate
21 to its customers its willingness to create an environment of greater pharmacy profits.
22 McKesson anticipated that the Scheme would ensure customer loyalty and possibly
23 increase its customer base, and, in fact, McKesson did maintain and increase its customer
24 base. For example, in an internal document dated February 3, 2004, McKesson bragged
25 that it maintained its status as the market share leader by retaining “100% of its key RNA
26 [retail national accounts] base,” winning “2-3 new big customers,” capturing “30% of

27 ⁸⁹ MCKAWP 0069615; *see also* MCKAWP 0084327.

28 ⁹⁰ MCKAWP 0084327; *see also* MCKAWP 0065592 (April 22, 2003, memo from
Bob James to Greg Yonko: “Worked on behalf of Vita Rx (now MSD) in raising the
AWP’s on Avonex, Copaxone and Betaseron to 20% [spread]. The impact of this effort
was to increase their profits by about \$800k per year ... each year, not just one time.”).

1 regional chains” and expanding its “#1 position” among wholesalers.⁹¹ McKesson
2 currently claims to have “the largest customer base in the health care industry.”⁹²

3 82. Defendant also appreciated that to benefit from the Scheme McKesson
4 would have to discretely inform its customers that it was behind all these changes,
5 otherwise “it’s possible that some of these accounts will believe that this stuff just
6 happens and our efforts will go unrecognized.”⁹³ “This sounds like something we should
7 at least [be] quietly communicating to our customers in order to get some mileage from
8 it[.]”⁹⁴ Greg Yonko affirmed: “I also think we should start communicating any AWP
9 changes so customer[s] know what’s going on, the end result should be beneficial.”⁹⁵

12 83. And so it began:

13 [To Bartell Drugs:] Celexa and Lexapro will have an AWP
14 markup of 25% or a spread of 20% as soon as FDB
15 information is updated. Look for change to happen next
16 week. Keep smilin[g] ... and who said we never listen to our
17 customers (and old friends).”⁹⁶

17 [To Bartell Drugs:] Just wanted you to know that Clarinex
18 AWP spreads went to 20% this week. A few weeks ago
19 Celexa went to 20% as well. Fat cat status is just around the
20 corner.”⁹⁷

19 [To Rite Aid:] P.S. latest AWP changes ... Celexa and
20 Clarinex, working on Lilly and Novo.”⁹⁸

21 ⁹¹ MCKAWP 0074404 at 74410.

22 ⁹² McKesson website, “Our History,” available at: http://www.mckesson.com/en_us/McKesson.com/About%2BUr/Our%2BCompany/Our%2BHistory.html

23 ⁹³ MCKAWP 0065895.

24 ⁹⁴ MCKAWP 0069732.

25 ⁹⁵ MCKAWP 0084300.

26 ⁹⁶ MCKAWP 0069817.

27 ⁹⁷ MCKAWP 0069901.

28 ⁹⁸ MCKAWP 0069911.

1 [To various individuals, not identified by pharmacy:] "I am
2 told" that the mark up on Avonex and both the old and new
3 sku's of Copaxone will be changed to 25% (to create a 25%
4 spread on WAC/AWP) next week.... Yes!! This should
5 make a significant contribution to your profitability as
6 illustrated by the following example using a reimbursement
7 of AWP – 15% plus \$2.00 fee:

8 Avonex at 16 $\frac{2}{3}$ % spread, profit would be \$18.42 ... and now
9 at a 20% spread, profit would be \$51.31 ... not bad! This is
10 an increase of \$32.89 per script.

11 Copaxone at 16 $\frac{2}{3}$ % spread, profit would be \$19.72 ... and
12 now at 20% spread, profit would be \$57.39 ... pretty good!
13 This is an increase of \$37.67 per script.⁹⁹

14 84. A field agent reported that customers were beginning to understand
15 McKesson's efforts: "Some of the more sav vy [sic] stores like Med-X have taken
16 notice."¹⁰⁰

17 85. In an e-mail to Yonko and others, James explained that the goodwill
18 McKesson established with the pharmacies as a result of inflating AWP's would give it a
19 substantial edge over its competition:

20 In my discussions [with select customers about McKesson's
21 efforts to "normalize" the AWP markup at 25%], one of the
22 comments that was made was "this would certainly be a good
23 reason to renew our agreement with McKesson when its
24 time." Talk about being good partners, wow! This is worth
25 further discussion as we go forward. Maybe a proactive
26 strategy like this will soften some of the activity around
27 asking for lower costs and more benefit.¹⁰¹

28 86. James proposed to Yonko and others that they discuss McKesson's efforts
with customer Omnicare who purportedly was looking for an extra-contractual year-end
bonus in the neighborhood of \$500,000:

Omnicare is looking for say \$500,000 in benefit from
year end deals, even though this was not part of their contract.

⁹⁹ MCKAWP 0084327.

¹⁰⁰ MCKAWP 0069732.

¹⁰¹ MCKAWP 0065895.

1 We need to ask them to roll up or recalculate their
2 reimbursements for last year based on the new AWP's with a
3 20% spread. And this is **not just a one time benefit**.
4 They will receive this now and each year going forward until
5 they renegotiate contracts with third parties (and hopefully do
6 not give up this gift).¹⁰²

7 87. James also noted with pleasure that Kay Morgan spoke "with Eric Sorkin at
8 RiteAid to let him know how much effort we are putting into this AWP thing to get it
9 right."¹⁰³ Other customers were also appreciative. For example, an unnamed customer
10 from Ohio called McKesson "to say that he was looking at some of these items again and
11 found that the spread appears to have increased significantly on most of these items to the
12 area of 20-21%. He wondered if we had any part in doing this and, if so, he wanted to let
13 us know that he really appreciated our efforts."¹⁰⁴

14 88. Med-X Corp.'s Director of Operations, Jerry Howard, reviewed the
15 numbers, put two and two together¹⁰⁵ and "was very ex[c]ited about" McKesson
16 "working on AWP expansion."¹⁰⁶

17 89. These internal comments are consistent with the 2007 public statements of
18 McKesson CEO and President John Hammergren, which emphasize that, while
19 McKesson wishes to help its retail customers, it only seeks to do so when that help is
20 mutually beneficial:
21

22 As to all of their [pharmacies'] pressures effect on McKesson,
23 all of those [Medicare Part D] things are outside of our
24 scheme. We don't use AWP or AMP or PDP negotiated
25 prices. Our contractual relationships with our customers are

26 ¹⁰² MCKAWP 0065895 (emphasis, ellipses in original).

27 ¹⁰³ MCKAWP 0069669.

28 ¹⁰⁴ MCKAWP 0069513.

¹⁰⁵ MCKAWP 0069732.

¹⁰⁶ MCKAWP 0069726.

1 independent of those mechanisms. So to the extent that they
2 are hurt, clearly, they can come back to us and say we would
3 like to have you help us with our margin pressure. And
4 although we're sympathetic to those plights, they've been
5 asking us to help them with their margin pressures for 30 or
6 40 years. We would have already ceased to exist if we had
7 helped them with their margin pressures over the years. So I
8 think that's more of a market competitive issue for McKesson
as to how we would respond, as opposed to whether or not
they're going to ask us for a better deal. We're asked about a
better deal all the time by our customers, and our sales forces
and our management teams are trained to only provide better
deals if it's a better deal for McKesson and there's some way
to for us to get a win-win out of it, as opposed to gee, I feel
your pain; why don't you take part of my margin?¹⁰⁷

9 90. Of course, increasing AWP's in collusion with First Data was a "win-win"
10 proposition for McKesson, because it rewarded McKesson's retail customers *without*
11 costing McKesson. Instead, reimbursers and patients all around the country would pay
12 the increased costs of the Scheme.
13

14 91. In an earnings conference call in the first quarter of 2003, McKesson's
15 CEO John Hammergren stated that McKesson's "gross margin expansion is being driven
16 a little bit now by price increases on branded products and if those price increase trends
17 stay the way they are, we could very well see gross margin expansion, as well."¹⁰⁸
18

19 **L. McKesson's Internal Documents Admit the Long-Term Effects of the Scheme**

20 92. While the Scheme was still in its infancy in September 2001, McKesson
21 realized that it would have a profound effect on its customer's profitability:

22 In August we were able to get the Concerta (formerly an Alza
23 product and now JOM) AWP spread raised to 20% from the
24 previous 16 ⅔% [i.e. an increase in the markup from 20% to
25 25%]. Last week we got agreement with First Data Bank on
raising the Searle products, which are now part of Pharmacia,
to a 20% spread as well as Genotropin which was a
Pharmacia product (with a 16 ⅔% spread). This may not

26 ¹⁰⁷ McKesson Corporation at the Goldman Sachs 28th Annual Global Healthcare
27 Conference, *Fair Disclosure Wire* (June 13, 2007).

28 ¹⁰⁸ See July 23, 2002, *Fair Disclosure Wire* article.

1 seem like a big deal but it has a huge positive impact on the
2 profitability of our customers.¹⁰⁹

3 93. Clearly, if McKesson had believed that the increases were only short-term,
4 it would not have bragged about a "huge positive impact on the profitability of our
5 customers." And in the previously cited e-mail from January 2002, Bob James confirmed
6 this when he explained that McKesson expected their customers to hold onto the "gift" of
7 the increased mark-ups well into the future:
8

9 A couple of years ago I was pulled into a conference call with
10 Steve somebody (I think) and our McKesson MHS sales
11 person, about how we were hurting them with our AWP's. He
12 came on very strong and was going to call John Hammergren,
13 etc. We calmed him down by explaining our process and
14 tried to make him understand that we were really their
15 advocates and were doing everything possible to "raise
16 AWP's when appropriate. I haven't heard anything since."

17 Here is an idea. Two years later, and having had some recent
18 success in raising AWP's, I think this could be presented to
19 him positively in this way:

20 We need to ask them to roll up or recalculate their
21 reimbursements for last year based on the new AWP's with a
22 20% spread. And this is **not just a one time benefit**. They
23 will receive this now and each year going forward until their
24 renegotiate contracts with third parties (and hopefully do not
25 give up this gift).¹¹⁰

26 Similarly, James confirmed in April 2003, that "We played a major role (and still do) in
27 normalizing the AWP's on Brand Pharmaceuticals" also confirms that this has provided
28 millions of dollars in improved profits across our industry.¹¹¹

94. As many as *three years* after the Scheme was implemented, McKesson
employees were still internally congratulating each other about its success. For example,

25 ¹⁰⁹ MCKAWP 0065885 (September 18, 2001, e-mail from Bob James to Greg
26 Yonko).

27 ¹¹⁰ MCKAWP 0065895 (January 7, 2002, e-mail from Bob James to Greg Yonko,
28 *et al.*) (emphasis in original).

¹¹¹ MCKAWP 0065592.

1 in a July 30, 2004, e-mail, McKesson's John Bonner acknowledged the Scheme's impact
2 on Payors and the corresponding benefit to McKesson's clients:

3 We try to "push" the AWP up to 25% above WAC rather than
4 20%. This may cause your customer some short term
5 reimbursement pain with the payors but in the long run, if
6 AWP at First Data Bank goes from 20% to 25%, your
7 customer will benefit.¹¹²

8 Most payors reimburse pharmacies at AWP minus 15 to 17%.
9 ***The higher AWP markup percentage, the more they are***
10 ***paid by the insurance company.*** Pharmacies barely break
11 even on items with 20% AWP.¹¹³

12 95. Again in July 2004, McKesson was calculating how much the price
13 increase at Johnson & Johnson had earned one of their clients: "Please see below for the
14 work-up of what the impact has been for Omnicare on JOM products relative to the
15 change in AWP spread. Three years ago J&J products were all 16 ⅔% AWP spread
16 products. Today, almost all of them are 20% spread. Procrit just changed last month."¹¹⁴
17 McKesson concluded that in the third year of the Scheme, for Procrit alone, profits
18 tripled, and taking all JOM products together, the effect is "***more than 3 times the profit***
19 ***as before.***"

20 96. Similarly, in April 2004, when writing to a manufacturer to decline its
21 request to set the mark-up for its products at 20%, James explained:

22 [T]hings have pretty much normalized at a 20% spread (1.25
23 markup) for Brand Rx, which has been extremely beneficial
24 for our customers.... Why do you want to take the
25 profitability away from the retail pharmacies by trying to use
26 a spread of 16 ⅔% when almost all other companies are
27 getting a 20% spread. If you have any doubts about what I

28 ¹¹² MCKAWP0076289. The "customer" here is a McKesson retail client.

¹¹³ *Id.* (e-mail string, including July 29, 2004, e-mail from John Bonner to Benjamin Coppolo).

¹¹⁴ MCKAWP 0068131-32 (e-mail string, including July 28, 2004, e-mail from Bob James to Andrew Stubbs, *et al.*).

1 am saying, please contact Scott Johnson at Albertsons, Dave
2 Vucurevich or Greg Drew at Rite Aid, Frank Seagraves at
Wal Mart, or Frank Scorpiniti at Longs.¹¹⁵

3 That McKesson was touting its benefits to Albertsons, Rite Aid, Longs and
4 Wal-Mart in 2004 underscores the evidence that the Scheme had long term effects on
5 end-payors.

6
7 **M. Evidence from Manufacturers Also Confirms the Existence of the Scheme and the
Impact on the Market**

8 97. The McKesson-First Data Scheme is corroborated by evidence from
9 manufacturers. For example, an internal memo from Johnson & Johnson ("J&J") from
10 May 15, 2002, titled "Wholesaler manipulation of AWP" stated:

12 At the recent McKesson meeting Greg Yonko confirmed that
13 McKesson was changing average selling price to reflect a
higher spread on AWP.... McKesson is implementing this
14 change after companies implement a price increase....
Amerisource Bergen and Cardinal have indicated that they
are NOT implementing the same strategy. .¹¹⁶

15 98. Other J&J documents also recognize that the Scheme caused artificial
16 increases for end-payors, while increasing pharmacy profits:

18 It has come to our attention that pricing services such as First
19 DataBank are now adjusting our recommended AWP's based
on a WAC + 25% formula. The result is a win for providers
20 (pharmacies) since their reimbursement from Medicaid is
increased. The state pays more and there is additional
21 pressure on the industry as a whole because state expenditure
for drugs will increase. This is an artificial price increase and
22 setting of the AWP is out of our hands.¹¹⁷

24 ¹¹⁵ MCKAWP 0071694 (April 20, 2004, e-mail from Bob James to Chad Lucero).

25 ¹¹⁶ MDL-OBI00002828-39; *see also* MDL-OBI00040610-15 (May 13, 2002, J&J
26 e-mail with attachments showing that ABC, Cardinal and McKesson each had 20% mark-
ups for Procrit and Epogen, but noting "Bob James confirms that AWP for both
27 PROCRT and Epogen will be moving to cost x 1.25 in the near future.").

28 ¹¹⁷ MDL-JJ00000110.

1 99. J&J drafted an internal memo in which it addressed First Data's
2 unauthorized increase of J&J's mark-up to 25%. It observed:

3 Since AWP is the basis for reimbursements in many
4 segments, this action will increase the strain on multiple
5 payers. The inflated AWP's would benefit pharmacists under
6 Medicaid payment procedures and since AWP is the primary
basis of Medicaid reimbursement, the impact to states could
be significant.

7 100. A Bristol Myers Squibb presentation also observed the changes, but
8 assumed that it was all First Data's doing:

9 First Data Bank has changed the way they create AWP. In
10 the past, some manufacturers list prices was marked up
11 20.5%, others 25% based on the product labeler code. Now,
concurrent with price increases, 25% mark-up is being
12 applied, regardless of historical precedence.¹¹⁸

13 101. The same is true about AstraZeneca, which observed:

14 Recently, FirstDataBank [sic] has independently begun to
15 revise the AWP for all branded pharmaceutical products to a
25% markup. We have been informed that FirstDataBank
16 [sic] is taking this action to create consistency in price
reporting. For AstraZeneca products with a 20% spread, the
17 spread will increase to 25% at the time of the WAC price
change, beginning on January 1, 2002, or by the end of the 1st
18 Qtr 2002, even if the price change was not changed. We have
seen the change to AZ and other companies' products that
had price changes in 2002.

19 How the spread changes could impact the industry and healthcare system

- 20 • Price perceptions – AWP is sometimes used to
21 compare prices so a higher spread appears to inflate
22 the prices of pharmaceutical products. As an example,
23 the new AWP price for Nexium 40 mg capsules is
\$4.32 – it would have been \$4.14 without the spread
24 changes.
- 25 • Pharmacy reimbursement – a higher spread can
26 translate into higher reimbursement to retailers and
27 mail order pharmacies to the extent a reimbursement

28 ¹¹⁸ BMS/AWP/01109780.

1 formula for private third party and Medicaid RX's is
2 anchored off of AWP.

3 * * * *

- 4 • Price comparisons – since AWP is sometimes used to
5 compare the prices of competing products the change
6 in spread will cause price differences to appear greater
7 or lesser depending on the specific situation....
8 However, according to FirstDataBank [sic] the spread
9 for all branded drugs will be changed to 25% by the
10 end of the 1st Qtr 2002.¹¹⁹

11 102. First Data kept the ruse alive when it told Aventis that “wholesalers” were
12 driving the changes:

13 First DataBank has advised me that after surveying the
14 wholesalers, they feel that there are very few manufacturers
15 that still have a 20% AWP to WAC spread. As a result First
16 DataBank has determined to employ a higher 25% AWP to
17 WAC spread for all Aventis products. This will be
18 implemented as we have price changes. Immediately *the*
19 *entire line of Allegra will be moved to a 25% spread from its*
20 *current 20%.* This will be effective immediately. The most
21 noticeable will be that it will be more profitable for the retail
22 pharmacist to dispense Allegra.¹²⁰

23 103. Although they ultimately did nothing about it, many of the manufacturers
24 objected to the increases.¹²¹

25 **N. Concealing the Scheme from Payors**

26 104. Defendant and FDB cleverly hid their conduct behind First Data's
27 confidential survey process to avoid detection by Payors and to preserve, for as long as
28 possible, the benefit they had conferred to the pharmacies.

¹¹⁹ AZ 00461109 (Freeberry, Exhibit Q, identified, Freeberry Dep. at 114:14-19).

¹²⁰ AV-BCA-0010336 (emphasis in original).

¹²¹ See, e.g., MDL-OBI00002617 (J&J); Deposition of John Freeberry (May 20, 2004) at 118:11-120:18; 125:7-15 (AstraZeneca). FDB-AWP 053695 at FDB-AWP 053697 (GlaxoSmithKline); see also MCKAWP 0068863 (Morgan e-mail to James, dated April 30, 2002: “ARGHH!!!! Lilly told our CEO and COO we were setting AWP.”).

1 105. Because the artificial mark-up increases were taken at the same time and
2 overshadowed by the manufacturers' published WAC increases, most Payors were
3 unaware of any mark-up increases and attributed the overall increases to manufacturer
4 price hikes.
5

6 106. Additionally McKesson and FDB made affirmative misrepresentations or
7 material omissions about their role in the Scheme, including without limitation, falsely
8 attributing mark-up increases to the wholesaler industry as a whole, as opposed to
9 McKesson's secret normalization agenda.¹²²
10

11 107. First Data continued to make false or misleading statements about the
12 integrity of its data and the means by which it calculated its AWP.¹²³ First Data also
13 kept McKesson's participation in the process secret by refusing to disclose the alleged
14 survey results on alleged grounds of confidentiality.¹²⁴ Additionally, when asked directly
15 whether First Data was in the process of normalizing markups, First Data not only denied
16
17

18 ¹²² See, e.g., AVA-BCA-0010336.

19 ¹²³ For example, FDB-AWP 02005 (page from First Data's website, dated
20 November 4, 2002) (stating that First Data surveys each of the national wholesalers to
21 determine mark-up), which Kay Morgan acknowledged was never a true statement of
22 First Data's survey practice. Patricia Kay Morgan 6.28.07 Dep. at 100:16-23.

23 ¹²⁴ See, e.g., FDB-AWP 053695 at FDB-AWP 053697 (March 1, 2002, letter from
24 GlaxoSmithKline complaining of the mark-up increases: "First DataBank has not been
25 willing to share any information regarding that survey or to disclose any other data that
26 might form the basis for this change in the formula. We were informed that First
27 DataBank considered the data to be proprietary. We were also told by certain of your
28 personnel that, because First DataBank alone sets AWP, we had no standing to request an
29 explanation from First DataBank for the extent of these increases in AWP."); Freeberry
30 Dep. (May 20, 2004), at 114:18-24 (regarding AstraZeneca's efforts to address FDB's
31 unauthorized increases of its mark-ups: "Q: Have you ever reviewed any of the
32 wholesaler surveys that First DataBank purportedly did? A: I asked for them; they
33 weren't provided.").

1 this and demanded to know the source of this “rumor,” but forwarded its response to
2 McKesson’s Bob James, who responded: “I love it! You’re the best.”¹²⁵

3 108. In a conference call with Aetna in September 2004, McKesson flatly denied
4 that it had any control over rising AWP’s,¹²⁶ while at the same time it bragged to select
5 customers that McKesson had “done [its] part” to increase AWP’s through increased
6 mark-ups.¹²⁷ Nor did McKesson publicly reveal its normalization Scheme, knowing that
7 if the increases were revealed, managed care would renegotiate with retail pharmacies
8 and McKesson’s “gift” to retailers would be lost.¹²⁸

9 109. The facts underlying the Scheme first came to light in about early 2005
10 when McKesson and First Data provided confidential discovery in response to subpoenas
11 in separate litigation involving AWP fraud by drug manufacturers. In June 2005, a group
12 of union health-plan funds, who had also been party to the litigation against the drug
13 manufacturers, filed a class-action lawsuit against McKesson and FDB, alleging that their
14 scheme harmed consumers, private health plans and insurers. *New England Carpenters*
15 *v. First Databank*, No. 1:05-cv-11148 PBS (D. Mass.). The case, litigated in
16 Massachusetts did not receive press coverage until October 2006, when FDB announced
17 that it had reached a settlement and that it had agreed to roll back the prices to the pre-
18 scheme ratio. Due to court challenges, FDB did not carry out the rollback until
19 September 26, 2009. Until that date FDB and Medi-Span (whose data was inflated when
20
21
22
23
24

25 ¹²⁵ MCKAWP 0069588.

26 ¹²⁶ MCKAWP 0078652.

27 ¹²⁷ MCKAWP 0065895.

28 ¹²⁸ MCKAWP 0065895.

1 it was under FDB's editorial guidance) continued to publish the inflated AWP's and
2 Payors, including consumers who pay a portion of the drugs costs as a co-payment,
3 continued to be harmed. McKesson also reached a settlement with the consumer co-payor
4 class in 2008 but limited the settlement to consumer co-payors' claim to damages through
5 March 2005.

7 **IV. CLAIMS FOR RELIEF**

8 **COUNT I**

9 **ARIZONA CONSUMER FRAUD ACT**

10 **(A.R.S. §§ 44-1521 TO 44-1534)**

11 110. Plaintiff incorporates by reference all preceding paragraphs as if fully set
12 forth herein and further alleges as follows.

13 111. McKesson engaged in the use of deception, deceptive acts or practices,
14 fraud, false pretense, false promise, misrepresentation, or concealment, suppression or
15 omission of any material fact with intent that others rely upon such concealment,
16 suppression or omission, in connection with the marketing and sale of the Subject Drugs
17 in Arizona. Such acts and practices include:

18 a. Intentionally and repeatedly providing false and inflated AWP's for the
19 Subject Drugs to FDB and Medi-Span, thereby causing the publication and republication
20 of false and inflated AWP's used in the retail sale of the Subject Drugs in the State of
21 Arizona. McKesson knew and intended that the published AWP's would be relied on by
22 parties to the retail sale of the Subject Drugs in the State of Arizona and would cause
23 Arizona Payors, including consumers, to be overcharged for the drugs.

24 b. Misrepresenting that drug price mark-ups were determined by historical
25 spreads set by drug manufacturers, when, in fact, McKesson itself had initiated the mark-
26 ups on more than 400 drugs.

1 c. Attempting to conceal its deceptive practices by publicly denying and
2 misrepresenting that it had any involvement in determining drug price mark-ups.

3 112. While engaging in the acts and practices alleged in this Complaint,
4 McKesson was at all times acting willfully as defined by A.R.S. § 44-1531.

5 113. Pursuant to A.R.S. §§ 44-1531(A) and (B), McKesson is liable for civil
6 penalties of up to \$10,000 per willful violation of the Act, as McKesson knew or should
7 have known that its conduct was of the nature prohibited by A.R.S. §§ 44-1522(A).

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff respectfully prays the Court will do as follows:

11 A. Adjudge and decree that Defendant has engaged in the conduct alleged
12 herein;

13
14 B. Adjudge and decree that the Defendant's conduct alleged herein is unlawful
15 and in violation of the Arizona Consumer Fraud Act ("the Act");

16 C. Enjoin Defendant from engaging in unlawful acts and practices prohibited
17 by the Act, pursuant to A.R.S. § 44-1528;

18
19 D. Order Defendant to pay a civil penalty of up to \$10,000 for each violation
20 of the Act pursuant to A.R.S. § 44-1531;

21 E. Order Defendant to restore to all persons any money and property acquired
22 by any unlawful means or practices alleged in the Complaint, as deemed appropriate by
23 the Court, pursuant to A.R.S. § 44-1528;

24
25 F. Award costs, including reasonable attorney's fees pursuant to A.R.S. § 44-
26 1534;

1 G. Order such other and further relief as the Court deems just, necessary and
2 appropriate.
3

4 DATED this 14th day of September, 2012.
5

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DATED this 14th day of September, 2012.

Robert B. Carey

APPENDIX A

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
MEDICIS DERMATOLOGICS INC	99207001980	A/T/S 2% TOPICAL SOLUTION
ASTRAZENECA LP	00310040180	ACCOLATE 10 MG TABLET
ASTRAZENECA LP	00310040239	ACCOLATE 20 MG TABLET
ASTRAZENECA LP	00310040260	ACCOLATE 20 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071053023	ACCUPRIL 10 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071053040	ACCUPRIL 10 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071053223	ACCUPRIL 20 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071053240	ACCUPRIL 20 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071053523	ACCUPRIL 40 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071052723	ACCUPRIL 5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071052740	ACCUPRIL 5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071022206	ACCURETIC 10-12.5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071022006	ACCURETIC 20-12.5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071022306	ACCURETIC 20-25 MG TABLET
JOHNSON & JOHNSON GROUP	62856024330	ACIPHEX 20 MG TABLET EC
JOHNSON & JOHNSON GROUP	62856024341	ACIPHEX 20 MG TABLET EC
JOHNSON & JOHNSON GROUP	62856024390	ACIPHEX 20 MG TABLET EC
WATSON LABORATORIES INC	52544093001	ACTIGALL 300 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149047001	ACTONEL 30 MG TABLET
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149047101	ACTONEL 5 MG TABLET
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149047103	ACTONEL 5 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764015104	ACTOS 15 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764015105	ACTOS 15 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764015106	ACTOS 15 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764030114	ACTOS 30 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764030115	ACTOS 30 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764030116	ACTOS 30 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764045124	ACTOS 45 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764045125	ACTOS 45 MG TABLET
TAKEDA PHARMACEUTICALS NORTH AMERICA INC	64764045126	ACTOS 45 MG TABLET
SHIRE US INC	54092038301	ADDERALL XR 10 MG CAPSULE SA
SHIRE US INC	54092038701	ADDERALL XR 20 MG CAPSULE SA
SHIRE US INC	54092039101	ADDERALL XR 30 MG CAPSULE SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069500	ADVAIR 100/50 DISKUS
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069502	ADVAIR 100/50 DISKUS
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069600	ADVAIR 250/50 DISKUS
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069602	ADVAIR 250/50 DISKUS
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069700	ADVAIR 500/50 DISKUS
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069702	ADVAIR 500/50 DISKUS
KOS PHARMACEUTICALS INC	60598000890	ADVICOR 1,000 MG/20 MG TABLET
KOS PHARMACEUTICALS INC	60598000690	ADVICOR 500 MG/20 MG TABLET
FOREST PHARMACEUTICALS INC	00458067299	AEROBID AEROSOL W/ADAPTER
FOREST PHARMACEUTICALS INC	00458067099	AEROBID-M AEROSOL W/ADAPTER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173068700	AGENERASE 15 MG/ML ORAL SOLN
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173067200	AGENERASE 150 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173067900	AGENERASE 50 MG CAPSULE
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597000160	AGGRENOX CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00025101131	ALDACTAZIDE 25/25 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025101155	ALDACTAZIDE 25/25 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025102131	ALDACTAZIDE 50/50 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025103131	ALDACTONE 100 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025103134	ALDACTONE 100 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025100131	ALDACTONE 25 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025100151	ALDACTONE 25 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025100155	ALDACTONE 25 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025104131	ALDACTONE 50 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025104134	ALDACTONE 50 MG TABLET
3M PHARMACEUTICALS	00089061012	ALDARA 5% CREAM
ZYBER PHARMACEUTICAL INC	65224065001	ALDEX TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	59572030250	ALKERAN 2 MG TABLET
MERRELL PHARMACEUTICALS INC	00088110947	ALLEGRA 180 MG TABLET
MERRELL PHARMACEUTICALS INC	00088110647	ALLEGRA 30 MG TABLET
MERRELL PHARMACEUTICALS INC	00088110747	ALLEGRA 60 MG TABLET
MERRELL PHARMACEUTICALS INC	00088109047	ALLEGRA-D TABLET SA
MERRELL PHARMACEUTICALS INC	00088109049	ALLEGRA-D TABLET SA
MERRELL PHARMACEUTICALS INC	00088109055	ALLEGRA-D TABLET SA
MCR AMERICAN PHARMACEUTICALS INC	58605051301	ALLFEN 1,000 MG TABLET SA
MCR AMERICAN PHARMACEUTICALS INC	58605052101	ALLFEN-DM TABLET SA
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597007017	ALUPENT 650 MCG INHALER COMP
MERRELL PHARMACEUTICALS INC	00039022110	AMARYL 1 MG TABLET
MERRELL PHARMACEUTICALS INC	00039022210	AMARYL 2 MG TABLET
MERRELL PHARMACEUTICALS INC	00039022211	AMARYL 2 MG TABLET
MERRELL PHARMACEUTICALS INC	00039022310	AMARYL 4 MG TABLET
MERRELL PHARMACEUTICALS INC	00039022311	AMARYL 4 MG TABLET
SANOFI SYNTHELABO INC	00024542131	AMBIEN 10 MG TABLET
SANOFI SYNTHELABO INC	00024542134	AMBIEN 10 MG TABLET
SANOFI SYNTHELABO INC	00024540131	AMBIEN 5 MG TABLET
SANOFI SYNTHELABO INC	00024540134	AMBIEN 5 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173056100	AMERGE 1 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173056200	AMERGE 2.5 MG TABLET
FERNDAL LABORATORIES INC	00496077804	ANALPRAM-HC 1% CREAM
FERNDAL LABORATORIES INC	00496080004	ANALPRAM-HC 2.5% CREAM
FERNDAL LABORATORIES INC	00496082904	ANALPRAM-HC 2.5% LOTION
HOFFMANN LA ROCHE INC	00004620201	ANAPROX 275 MG TABLET
SANOFI SYNTHELABO INC	00024008401	ARALEN PHOSPHATE 500 MG TAB
MERRELL PHARMACEUTICALS INC	00088216030	ARAVA 10 MG TABLET

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
MERRELL PHARMACEUTICALS INC	00088216130	ARAVA 20 MG TABLET
ASTRAZENECA LP	00310020130	ARIMIDEX 1 MG TABLET
FOREST PHARMACEUTICALS INC	00456046100	ARMOUR THYROID 120 MG TABLET
FOREST PHARMACEUTICALS INC	00456046101	ARMOUR THYROID 120 MG TABLET
FOREST PHARMACEUTICALS INC	00456046163	ARMOUR THYROID 120 MG TABLET
FOREST PHARMACEUTICALS INC	00456045701	ARMOUR THYROID 15 MG TABLET
FOREST PHARMACEUTICALS INC	00456046200	ARMOUR THYROID 180 MG TABLET
FOREST PHARMACEUTICALS INC	00456046201	ARMOUR THYROID 180 MG TABLET
FOREST PHARMACEUTICALS INC	00456046301	ARMOUR THYROID 240 MG TABLET
FOREST PHARMACEUTICALS INC	00456045800	ARMOUR THYROID 30 MG TABLET
FOREST PHARMACEUTICALS INC	00456045801	ARMOUR THYROID 30 MG TABLET
FOREST PHARMACEUTICALS INC	00456045863	ARMOUR THYROID 30 MG TABLET
FOREST PHARMACEUTICALS INC	00456046401	ARMOUR THYROID 300 MG TABLET
FOREST PHARMACEUTICALS INC	00456045900	ARMOUR THYROID 60 MG TABLET
FOREST PHARMACEUTICALS INC	00456045901	ARMOUR THYROID 60 MG TABLET
FOREST PHARMACEUTICALS INC	00456045951	ARMOUR THYROID 60 MG TABLET
FOREST PHARMACEUTICALS INC	00456045963	ARMOUR THYROID 60 MG TABLET
FOREST PHARMACEUTICALS INC	00456046001	ARMOUR THYROID 90 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025141134	ARTHROTEC 50 TABLET EC
PFIZER LABORATORIES DIV PFIZER INC	00025141160	ARTHROTEC 50 TABLET EC
PFIZER LABORATORIES DIV PFIZER INC	00025141160	ARTHROTEC 50 TABLET EC
PFIZER LABORATORIES DIV PFIZER INC	00025142134	ARTHROTEC 75 TABLET EC
PFIZER LABORATORIES DIV PFIZER INC	00025142160	ARTHROTEC 75 TABLET EC
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149075202	ASACOL 400 MG TABLET EC
ASTRAZENECA LP	00186001628	ATACAND 16 MG TABLET
ASTRAZENECA LP	00186001631	ATACAND 16 MG TABLET
ASTRAZENECA LP	00186001654	ATACAND 16 MG TABLET
ASTRAZENECA LP	00186003228	ATACAND 32 MG TABLET
ASTRAZENECA LP	00186003231	ATACAND 32 MG TABLET
ASTRAZENECA LP	00186003254	ATACAND 32 MG TABLET
ASTRAZENECA LP	00186000431	ATACAND 4 MG TABLET
ASTRAZENECA LP	00186000831	ATACAND 8 MG TABLET
ASTRAZENECA LP	00186016228	ATACAND HCT 16/12.5 MG TAB
ASTRAZENECA LP	00186016254	ATACAND HCT 16/12.5 MG TAB
ASTRAZENECA LP	00186032228	ATACAND HCT 32/12.5 MG TAB
ASTRAZENECA LP	00186032254	ATACAND HCT 32/12.5 MG TAB
PFIZER LABORATORIES DIV PFIZER INC	00049559093	ATARAX 10 MG/5 ML SYRUP
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597008062	ATROVENT 0.02% SOLUTION
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597008130	ATROVENT 0.03% SPRAY
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597008676	ATROVENT 0.06% SPRAY
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597008214	ATROVENT INHALER
BRISTOL MYERS SQUIBB CO	00087277531	AVALIDE 150-12.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277532	AVALIDE 150-12.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277631	AVALIDE 300-12.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277632	AVALIDE 300-12.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277215	AVAPRO 150 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277231	AVAPRO 150 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277232	AVAPRO 150 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277235	AVAPRO 150 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277315	AVAPRO 300 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277331	AVAPRO 300 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277332	AVAPRO 300 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277131	AVAPRO 75 MG TABLET
BRISTOL MYERS SQUIBB CO	00087277132	AVAPRO 75 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00062208506	AXERT 12.5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00062208006	AXERT 6.25 MG TABLET
MERRELL PHARMACEUTICALS INC	00075006037	AZMACORT INHALER
WOMEN FIRST HEALTHCARE INC	64248000410	BACTRIM 400-80 MG TABLET
WOMEN FIRST HEALTHCARE INC	64248011710	BACTRIM DS TABLET
FOREST PHARMACEUTICALS INC	00456080101	BANCAP HC CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173033602	BECONASE 42 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173046800	BECONASE 42 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173038879	BECONASE AQ 0.042% SPRAY
AXCAN SCANDIPHARM INC	00068012061	BENTYL 10 MG CAPSULE
AXCAN SCANDIPHARM INC	00068012516	BENTYL 10 MG/5 ML SYRUP
AXCAN SCANDIPHARM INC	00068012361	BENTYL 20 MG TABLET
MERRELL PHARMACEUTICALS INC	00066049425	BENZAFLIN GEL
ABBOTT LABORATORIES	00074336811	BIAXIN 250 MG TABLET
ABBOTT LABORATORIES	00074258611	BIAXIN 500 MG TABLET
JOHNSON & JOHNSON GROUP	17314933001	BICITRA SOLUTION
AAIPHARMA LLC	00028007201	BRETHINE 2.5 MG TABLET
AAIPHARMA LLC	00028007210	BRETHINE 2.5 MG TABLET
AAIPHARMA LLC	00028010501	BRETHINE 5 MG TABLET
AAIPHARMA LLC	00028010510	BRETHINE 5 MG TABLET
SANOFI SYNTHELABO INC	00024028016	BRONCHOLATE SYRUP
HOFFMANN LA ROCHE INC	00004012501	BUMEX 0.5 MG TABLET
HOFFMANN LA ROCHE INC	00004012511	BUMEX 0.5 MG TABLET
HOFFMANN LA ROCHE INC	00004012101	BUMEX 1 MG TABLET
HOFFMANN LA ROCHE INC	00004012111	BUMEX 1 MG TABLET
HOFFMANN LA ROCHE INC	00004012114	BUMEX 1 MG TABLET
HOFFMANN LA ROCHE INC	00004016201	BUMEX 2 MG TABLET
HOFFMANN LA ROCHE INC	00004016211	BUMEX 2 MG TABLET
RECKITT BENCKISER HEALTHCARE UK LIMITED	12496075701	BUPRENEX 0.3 MG/ML AMPUL
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00067611142	CAFCIT 20 MG/ML ORAL SOLN
NOVARTIS PHARMACEUTICALS CORP	00078003302	CAFERGOT SUPPOSITORY
PFIZER LABORATORIES DIV PFIZER INC	00025186131	CALAN 120 MG TABLET

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
PFIZER LABORATORIES DIV PFIZER INC	00025186152	CALAN 120 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025177131	CALAN 40 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025185131	CALAN 80 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025185151	CALAN 80 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025185152	CALAN 80 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025190131	CALAN SR 120 MG CAPLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025190134	CALAN SR 120 MG CAPLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025191131	CALAN SR 180 MG CAPLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025191134	CALAN SR 180 MG CAPLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025189131	CALAN SR 240 MG CAPLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025189134	CALAN SR 240 MG CAPLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025189151	CALAN SR 240 MG CAPLET SA
MERRELL PHARMACEUTICALS INC	00068003701	CANTIL 25 MG TABLET
AXCAN SCANDIPHARM INC	58914017110	CARAFATE 1 GM TABLET
AXCAN SCANDIPHARM INC	58914017121	CARAFATE 1 GM TABLET
AXCAN SCANDIPHARM INC	58914017130	CARAFATE 1 GM TABLET
AXCAN SCANDIPHARM INC	58914017150	CARAFATE 1 GM TABLET
HOFFMANN LA ROCHE INC	00004018301	CARDENE 20 MG CAPSULE
HOFFMANN LA ROCHE INC	00004018401	CARDENE 30 MG CAPSULE
HOFFMANN LA ROCHE INC	00004018022	CARDENE SR 30 MG CAPSULE SA
HOFFMANN LA ROCHE INC	00004018091	CARDENE SR 30 MG CAPSULE SA
HOFFMANN LA ROCHE INC	00004018122	CARDENE SR 45 MG CAPSULE SA
HOFFMANN LA ROCHE INC	00004018191	CARDENE SR 45 MG CAPSULE SA
HOFFMANN LA ROCHE INC	00004018222	CARDENE SR 60 MG CAPSULE SA
BIOVAIL PHARMACEUTICALS INC	64455079247	CARDIZEM 120 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088177147	CARDIZEM 30 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088177155	CARDIZEM 30 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088177190	CARDIZEM 30 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088177247	CARDIZEM 60 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088177255	CARDIZEM 60 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088177290	CARDIZEM 60 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088179147	CARDIZEM 90 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00088179530	CARDIZEM CD 120 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179542	CARDIZEM CD 120 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	64455079549	CARDIZEM CD 120 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179630	CARDIZEM CD 180 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179642	CARDIZEM CD 180 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	64455079649	CARDIZEM CD 180 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	64455079650	CARDIZEM CD 180 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179730	CARDIZEM CD 240 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179742	CARDIZEM CD 240 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	64455079749	CARDIZEM CD 240 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179830	CARDIZEM CD 300 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088179842	CARDIZEM CD 300 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	64455079849	CARDIZEM CD 300 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	64455079942	CARDIZEM CD 360 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088177947	CARDIZEM SR 120 MG CAP SA
BIOVAIL PHARMACEUTICALS INC	00088177747	CARDIZEM SR 60 MG CAPSULE SA
BIOVAIL PHARMACEUTICALS INC	00088177847	CARDIZEM SR 90 MG CAPSULE SA
ASTRAZENECA LP	00310070510	CASODEX 50 MG TABLET
ASTRAZENECA LP	00310070530	CASODEX 50 MG TABLET
ASTRAZENECA LP	00310070539	CASODEX 50 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028015101	CATAFLAM 50 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597000601	CATAPRES 0.1 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597000701	CATAPRES 0.2 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597001101	CATAPRES 0.3 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597003112	CATAPRES-TTS 1 PATCH
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597003212	CATAPRES-TTS 2 PATCH
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597003334	CATAPRES-TTS 3 PATCH
BRISTOL MYERS SQUIBB CO	00015303020	CEENU 10 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00015303220	CEENU 100 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00015303120	CEENU 40 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00015303410	CEENU DOSE PACK
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039501	CEFTIN 125 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173040600	CEFTIN 125 MG/5 ML ORAL SUSP
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173038700	CEFTIN 250 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173038701	CEFTIN 250 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173038742	CEFTIN 250 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173065400	CEFTIN 250 MG/5 ML ORAL SUSP
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173065500	CEFTIN 250 MG/5 ML ORAL SUSP
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039400	CEFTIN 500 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039401	CEFTIN 500 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039442	CEFTIN 500 MG TABLET
BRISTOL MYERS SQUIBB CO	00087772060	CEFZIL 250 MG TABLET
BRISTOL MYERS SQUIBB CO	00087772150	CEFZIL 500 MG TABLET
BRISTOL MYERS SQUIBB CO	00087772160	CEFZIL 500 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025152031	CELEBREX 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025152034	CELEBREX 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025152051	CELEBREX 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025152531	CELEBREX 200 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025152534	CELEBREX 200 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025152551	CELEBREX 200 MG CAPSULE
SCHERING CORP	00085094205	CELESTONE 0.6 MG/5 ML SYRUP
FOREST PHARMACEUTICALS INC	00456401001	CELEXA 10 MG TABLET
FOREST PHARMACEUTICALS INC	00456413008	CELEXA 10 MG/5 ML SOLUTION
FOREST PHARMACEUTICALS INC	00456402001	CELEXA 20 MG TABLET

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
FOREST PHARMACEUTICALS INC	00456402063	CELEXA 20 MG TABLET
FOREST PHARMACEUTICALS INC	00456404001	CELEXA 40 MG TABLET
FOREST PHARMACEUTICALS INC	00456404063	CELEXA 40 MG TABLET
HOFFMANN LA ROCHE INC	00004026129	CELLCEPT 200 MG/ML ORAL SUSP
HOFFMANN LA ROCHE INC	00004025901	CELLCEPT 250 MG CAPSULE
HOFFMANN LA ROCHE INC	00004025905	CELLCEPT 250 MG CAPSULE
HOFFMANN LA ROCHE INC	00004025943	CELLCEPT 250 MG CAPSULE
HOFFMANN LA ROCHE INC	00004026001	CELLCEPT 500 MG TABLET
HOFFMANN LA ROCHE INC	00004026043	CELLCEPT 500 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071052524	CELONTIN 300 MG KAPSEAL
PFIZER LABORATORIES DIV PFIZER INC	00071053724	CELONTIN KAPSEAL 150 MG
US PHARMACEUTICAL CORP	52747014080	CENOGEN ULTRA CAPSULE
PURDUE PHARMACEUTICAL PRODUCTS LP	00034549006	CERUMENEX 10% EAR DROPS
PURDUE PHARMACEUTICAL PRODUCTS LP	00034549012	CERUMENEX 10% EAR DROPS
FOREST PHARMACEUTICALS INC	00456412363	CERVIDIL 10 MG VAGINAL INSRIT
BAYER CORP PHARMACEUTICAL DIV	00026855336	CIPRO 10% SUSPENSION
BAYER CORP PHARMACEUTICAL DIV	00026851106	CIPRO 100 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026851248	CIPRO 250 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026851251	CIPRO 250 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026855136	CIPRO 5% SUSPENSION
BAYER CORP PHARMACEUTICAL DIV	00026851348	CIPRO 500 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026851351	CIPRO 500 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026851448	CIPRO 750 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026851450	CIPRO 750 MG TABLET
SCHERING CORP	00085126401	CLARINEX 5 MG TABLET
SCHERING CORP	00085126402	CLARINEX 5 MG TABLET
SCHERING CORP	00085126403	CLARINEX 5 MG TABLET
SCHERING CORP	00085126404	CLARINEX 5 MG TABLET
SCHERING CORP	00085112802	CLARITIN 10 MG REDITABS
SCHERING CORP	00085045803	CLARITIN 10 MG TABLET
SCHERING CORP	00085045804	CLARITIN 10 MG TABLET
SCHERING CORP	00085045805	CLARITIN 10 MG TABLET
SCHERING CORP	00085045806	CLARITIN 10 MG TABLET
SCHERING CORP	00085122301	CLARITIN 10 MG/10 ML SYRUP
SCHERING CORP	00085063501	CLARITIN-D 12 HOUR TAB SA
SCHERING CORP	00085063504	CLARITIN-D 12 HOUR TAB SA
SCHERING CORP	00085063505	CLARITIN-D 12 HOUR TAB SA
SCHERING CORP	00085123301	CLARITIN-D 24 HOUR TAB SA
SCHERING CORP	00085123302	CLARITIN-D 24 HOUR TAB SA
FERNDAL LABORATORIES INC	00496085745	CLINAC BPO 7% GEL
MERRELL PHARMACEUTICALS INC	00068022630	CLOMID 50 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078012705	CLOZARIL 100 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078012706	CLOZARIL 100 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078012605	CLOZARIL 25 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078012606	CLOZARIL 25 MG TABLET
FIRST HORIZON PHARMACEUTICAL CORP	59630019012	COGNEX 10 MG CAPSULE
FIRST HORIZON PHARMACEUTICAL CORP	59630019112	COGNEX 20 MG CAPSULE
FIRST HORIZON PHARMACEUTICAL CORP	59630019212	COGNEX 30 MG CAPSULE
FIRST HORIZON PHARMACEUTICAL CORP	59630019312	COGNEX 40 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078037745	COMBIPATCH 0.05/0.14 MG PTCH
NOVARTIS PHARMACEUTICALS CORP	00078037742	COMBIPATCH 0.05/0.14 MG PTCH
NOVARTIS PHARMACEUTICALS CORP	00078037845	COMBIPATCH 0.05/0.25 MG PTCH
NOVARTIS PHARMACEUTICALS CORP	00078037842	COMBIPATCH 0.05/0.25 MG PTCH
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597001314	COMBIVENT INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173059500	COMBIVIR TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173059502	COMBIVIR TABLET
NOVARTIS PHARMACEUTICALS CORP	00078032705	COMTAN 200 MG TABLET
JOHNSON & JOHNSON GROUP	17314585002	CONCERTA 18 MG TABLET SA
JOHNSON & JOHNSON GROUP	17314585102	CONCERTA 36 MG TABLET SA
JOHNSON & JOHNSON GROUP	17314585202	CONCERTA 54 MG TABLET SA
WATSON LABORATORIES INC	55515010201	CONDYLOX 0.5% GEL
WATSON LABORATORIES INC	55515010101	CONDYLOX 0.5% TOPICAL SOLN
WATSON LABORATORIES INC	55515001424	CORDRAN 4 MCG/SQ CM TAPE
WATSON LABORATORIES INC	55515001480	CORDRAN 4 MCG/SQ CM TAPE
WATSON LABORATORIES INC	55515003515	CORDRAN SP 0.05% CREAM
WATSON LABORATORIES INC	55515003530	CORDRAN SP 0.05% CREAM
WATSON LABORATORIES INC	55515003560	CORDRAN SP 0.05% CREAM
MONARCH PHARMACEUTICALS INC	61570020301	CORGARD 120 MG TABLET
MONARCH PHARMACEUTICALS INC	61570020401	CORGARD 160 MG TABLET
MONARCH PHARMACEUTICALS INC	61570020001	CORGARD 20 MG TABLET
MONARCH PHARMACEUTICALS INC	61570020101	CORGARD 40 MG TABLET
MONARCH PHARMACEUTICALS INC	61570020110	CORGARD 40 MG TABLET
MONARCH PHARMACEUTICALS INC	61570020201	CORGARD 80 MG TABLET
MONARCH PHARMACEUTICALS INC	61570020210	CORGARD 80 MG TABLET
MONARCH PHARMACEUTICALS INC	61570017501	CORZIDE 40/5 TABLET
MONARCH PHARMACEUTICALS INC	61570017601	CORZIDE 80/5 TABLET
BRISTOL MYERS SQUIBB CO	00056016970	COUMADIN 1 MG TABLET
BRISTOL MYERS SQUIBB CO	00056016975	COUMADIN 1 MG TABLET
BRISTOL MYERS SQUIBB CO	00056016990	COUMADIN 1 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017470	COUMADIN 10 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017475	COUMADIN 10 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017070	COUMADIN 2 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017075	COUMADIN 2 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017090	COUMADIN 2 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017670	COUMADIN 2.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017675	COUMADIN 2.5 MG TABLET

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
BRISTOL MYERS SQUIBB CO	00056017690	COUMADIN 2.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00056018870	COUMADIN 3 MG TABLET
BRISTOL MYERS SQUIBB CO	00056018875	COUMADIN 3 MG TABLET
BRISTOL MYERS SQUIBB CO	00056018890	COUMADIN 3 MG TABLET
BRISTOL MYERS SQUIBB CO	00056016870	COUMADIN 4 MG TABLET
BRISTOL MYERS SQUIBB CO	00056016875	COUMADIN 4 MG TABLET
BRISTOL MYERS SQUIBB CO	00056016890	COUMADIN 4 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017270	COUMADIN 5 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017275	COUMADIN 5 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017290	COUMADIN 5 MG TABLET
BRISTOL MYERS SQUIBB CO	00056018970	COUMADIN 6 MG TABLET
BRISTOL MYERS SQUIBB CO	00056018975	COUMADIN 6 MG TABLET
BRISTOL MYERS SQUIBB CO	00056018990	COUMADIN 6 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017370	COUMADIN 7.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00056017375	COUMADIN 7.5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025201131	COVERA-HS 180 MG TABLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025201134	COVERA-HS 180 MG TABLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025202131	COVERA-HS 240 MG TABLET SA
PFIZER LABORATORIES DIV PFIZER INC	00025202134	COVERA-HS 240 MG TABLET SA
ORGANON USA INC	00052028306	CYCLESSA 28 DAY TABLET
NOVARTIS PHARMACEUTICALS CORP	00083002430	CYTADREN 250 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025145120	CYTOTEC 100 MCG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025145134	CYTOTEC 100 MCG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025145160	CYTOTEC 100 MCG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025146131	CYTOTEC 200 MCG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025146134	CYTOTEC 200 MCG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025146160	CYTOTEC 200 MCG TABLET
HOFFMANN LA ROCHE INC	00004026948	CYTOVENE 250 MG CAPSULE
HOFFMANN LA ROCHE INC	00004027848	CYTOVENE 500 MG CAPSULE
SANOFI SYNTHELABO INC	00024030406	DANOCRINE 100 MG CAPSULE
SANOFI SYNTHELABO INC	00024030506	DANOCRINE 200 MG CAPSULE
SANOFI SYNTHELABO INC	00024030560	DANOCRINE 200 MG CAPSULE
SANOFI SYNTHELABO INC	00024030306	DANOCRINE 50 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149003305	DANTRIUM 100 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149003005	DANTRIUM 25 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149003066	DANTRIUM 25 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149003105	DANTRIUM 50 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173020155	DARAPRIM 25 MG TABLET
AAIPHARMA LLC	00002036302	DARVOCET-N 100 TABLET
AAIPHARMA LLC	00002036303	DARVOCET-N 100 TABLET
AAIPHARMA LLC	00002036333	DARVOCET-N 100 TABLET
AAIPHARMA LLC	00002035102	DARVOCET-N 50 TABLET
AAIPHARMA LLC	00002080303	DARVON 65 MG PULVULE
AAIPHARMA LLC	00002080333	DARVON 65 MG PULVULE
AAIPHARMA LLC	66591062241	DARVON 65 MG PULVULE
AAIPHARMA LLC	00002311102	DARVON COMPOUND-65 PULVULE
AAIPHARMA LLC	00002311103	DARVON COMPOUND-65 PULVULE
AAIPHARMA LLC	00002035333	DARVON-N 100 MG TABLET
AAIPHARMA LLC	66591063141	DARVON-N 100 MG TABLET
AAIPHARMA LLC	66591063151	DARVON-N 100 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025138131	DAYPRO 600 MG CAPLET
PFIZER LABORATORIES DIV PFIZER INC	00025138134	DAYPRO 600 MG CAPLET
PFIZER LABORATORIES DIV PFIZER INC	00025138151	DAYPRO 600 MG CAPLET
HOFFMANN LA ROCHE INC	00004026301	DEMADEX 10 MG TABLET
HOFFMANN LA ROCHE INC	00004026349	DEMADEX 10 MG TABLET
HOFFMANN LA ROCHE INC	00004026706	DEMADEX 10 MG/ML AMPUL
HOFFMANN LA ROCHE INC	00004026806	DEMADEX 10 MG/ML AMPUL
HOFFMANN LA ROCHE INC	00004026501	DEMADEX 100 MG TABLET
HOFFMANN LA ROCHE INC	00004026549	DEMADEX 100 MG TABLET
HOFFMANN LA ROCHE INC	00004026401	DEMADEX 20 MG TABLET
HOFFMANN LA ROCHE INC	00004026449	DEMADEX 20 MG TABLET
HOFFMANN LA ROCHE INC	00004026201	DEMADEX 5 MG TABLET
HOFFMANN LA ROCHE INC	00004026249	DEMADEX 5 MG TABLET
SANOFI SYNTHELABO INC	00024033704	DEMEROL 100 MG TABLET
SANOFI SYNTHELABO INC	00024033504	DEMEROL 50 MG TABLET
SANOFI SYNTHELABO INC	00024033506	DEMEROL 50 MG TABLET
SANOFI SYNTHELABO INC	00024033502	DEMEROL 50 MG TABLET
SANOFI SYNTHELABO INC	00024033206	DEMEROL 50 MG/5 ML SYRUP
PFIZER LABORATORIES DIV PFIZER INC	00025016109	DEMULEN 1/35-28 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025016124	DEMULEN 1/35-28 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025008109	DEMULEN 1/50-28 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025008124	DEMULEN 1/50-28 TABLET
ABBOTT LABORATORIES	00074611411	DEPAKOTE 125 MG SPRINKLE CAP
ABBOTT LABORATORIES	00074621211	DEPAKOTE 125 MG TABLET EC
ABBOTT LABORATORIES	00074621411	DEPAKOTE 250 MG TABLET EC
ABBOTT LABORATORIES	00074621511	DEPAKOTE 500 MG TABLET EC
ORGANON USA INC	00052026106	DESOGEN 28 DAY TABLET
MERRELL PHARMACEUTICALS INC	00039005305	DIABETA 1.25 MG TABLET
HOECHST ROUSSEL PHARMACEUTICALS DIV	00039005005	DIABETA 1.25MG TABLET
MERRELL PHARMACEUTICALS INC	00039005110	DIABETA 2.5 MG TABLET
MERRELL PHARMACEUTICALS INC	00039005111	DIABETA 2.5 MG TABLET
MERRELL PHARMACEUTICALS INC	00039005150	DIABETA 2.5 MG TABLET
MERRELL PHARMACEUTICALS INC	00039005210	DIABETA 5 MG TABLET
MERRELL PHARMACEUTICALS INC	00039005211	DIABETA 5 MG TABLET
MERRELL PHARMACEUTICALS INC	00039005250	DIABETA 5 MG TABLET
MERRELL PHARMACEUTICALS INC	00039005270	DIABETA 5 MG TABLET

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149040560	DIDRONEL 200 MG TABLET
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149040660	DIDRONEL 400 MG TABLET
WATSON LABORATORIES INC	52544048201	DILACOR XR 120 MG CAPSULE SA
WATSON LABORATORIES INC	00075025000	DILACOR XR 120MG CAPSULE SA
WATSON LABORATORIES INC	52544073201	DILACOR XR 120MG CAPSULE SA
WATSON LABORATORIES INC	52544048301	DILACOR XR 180 MG CAPSULE SA
WATSON LABORATORIES INC	52544048305	DILACOR XR 180 MG CAPSULE SA
WATSON LABORATORIES INC	00075025100	DILACOR XR 180MG CAPSULE SA
WATSON LABORATORIES INC	52544073301	DILACOR XR 180MG CAPSULE SA
WATSON LABORATORIES INC	52544048401	DILACOR XR 240 MG CAPSULE SA
WATSON LABORATORIES INC	52544048405	DILACOR XR 240 MG CAPSULE SA
WATSON LABORATORIES INC	00075025200	DILACOR XR 240MG CAPSULE SA
WATSON LABORATORIES INC	52544073401	DILACOR XR 240MG CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00071036224	DILANTIN 100 MG KAPSEAL
PFIZER LABORATORIES DIV PFIZER INC	00071036232	DILANTIN 100 MG KAPSEAL
PFIZER LABORATORIES DIV PFIZER INC	00071036240	DILANTIN 100 MG KAPSEAL
PFIZER LABORATORIES DIV PFIZER INC	00071221420	DILANTIN 125 MG/5 ML SUSP
PFIZER LABORATORIES DIV PFIZER INC	00071036524	DILANTIN 30 MG KAPSEAL
PFIZER LABORATORIES DIV PFIZER INC	00071000724	DILANTIN 50 MG INFATAB
PFIZER LABORATORIES DIV PFIZER INC	00071000740	DILANTIN 50 MG INFATAB
SCHERING CORP	00085063401	DIPROLENE 0.05% GEL
SCHERING CORP	00085063403	DIPROLENE 0.05% GEL
SCHERING CORP	00085096201	DIPROLENE 0.05% LOTION
SCHERING CORP	00085096202	DIPROLENE 0.05% LOTION
SCHERING CORP	00085057502	DIPROLENE 0.05% OINTMENT
SCHERING CORP	00085057505	DIPROLENE 0.05% OINTMENT
SCHERING CORP	00085051701	DIPROLENE AF 0.05% CREAM
SCHERING CORP	00085051704	DIPROLENE AF 0.05% CREAM
JOHNSON & JOHNSON GROUP	17314920001	DITROPAN 5 MG TABLET
JOHNSON & JOHNSON GROUP	17314920002	DITROPAN 5 MG TABLET
JOHNSON & JOHNSON GROUP	17314920003	DITROPAN 5 MG TABLET
JOHNSON & JOHNSON GROUP	17314920104	DITROPAN 5 MG/5 ML SYRUP
WARNER CHILCOTT INC	00430083819	DORYX 100 MG CAPSULE EC
WARNER CHILCOTT INC	00430083820	DORYX 75 MG CAPSULE EC
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072026006	DOVONEX 0.005% CREAM
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072026012	DOVONEX 0.005% CREAM
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072254006	DOVONEX 0.005% OINTMENT
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072254012	DOVONEX 0.005% OINTMENT
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072116006	DOVONEX 0.005% SOLUTION
SANOI SYNTHELABO INC	00024039202	DRISDOL 50,000 UNITS CAPSULE
JOHNSON & JOHNSON GROUP	50458003605	DURAGESIC 100 MCG/HR PATCH
JOHNSON & JOHNSON GROUP	50458003305	DURAGESIC 25 MCG/HR PATCH
JOHNSON & JOHNSON GROUP	50458003405	DURAGESIC 50 MCG/HR PATCH
JOHNSON & JOHNSON GROUP	50458003505	DURAGESIC 75 MCG/HR PATCH
WARNER CHILCOTT INC	00430278217	DURICEF 250 MG/5 ML ORAL SUSP
WARNER CHILCOTT INC	00087078446	DURICEF 500 MG CAPSULE
WARNER CHILCOTT INC	00430278317	DURICEF 500 MG/5 ML ORAL SUSP
RELIANT PHARMACEUTICALS INC	65726022815	DYNACIRC 2.5 MG CAPSULE
RELIANT PHARMACEUTICALS INC	65726022825	DYNACIRC 2.5 MG CAPSULE
RELIANT PHARMACEUTICALS INC	65726022715	DYNACIRC 5 MG CAPSULE
RELIANT PHARMACEUTICALS INC	65726022725	DYNACIRC 5 MG CAPSULE
RELIANT PHARMACEUTICALS INC	65726023610	DYNACIRC CR 10 MG TABLET SA
RELIANT PHARMACEUTICALS INC	65726023625	DYNACIRC CR 10 MG TABLET SA
RELIANT PHARMACEUTICALS INC	65726023510	DYNACIRC CR 5 MG TABLET SA
RELIANT PHARMACEUTICALS INC	65726023525	DYNACIRC CR 5 MG TABLET SA
HOFFMANN LA ROCHE INC	00004641501	EC-NAPROSYN 375 MG TABLET EC
HOFFMANN LA ROCHE INC	00004641601	EC-NAPROSYN 500 MG TABLET EC
ASTRAZENECA LP	00310004010	ELAVIL 10 MG TABLET
ASTRAZENECA LP	00310004310	ELAVIL 100 MG TABLET
ASTRAZENECA LP	00310004710	ELAVIL 150 MG TABLET
ASTRAZENECA LP	00310004730	ELAVIL 150 MG TABLET
ASTRAZENECA LP	00310004510	ELAVIL 25 MG TABLET
ASTRAZENECA LP	00310004550	ELAVIL 25 MG TABLET
ASTRAZENECA LP	00310004110	ELAVIL 50 MG TABLET
ASTRAZENECA LP	00310004210	ELAVIL 75 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078037540	ELIDEL 1% CREAM
NOVARTIS PHARMACEUTICALS CORP	00078037546	ELIDEL 1% CREAM
NOVARTIS PHARMACEUTICALS CORP	00078037563	ELIDEL 1% CREAM
SANOI SYNTHELABO INC	00024079375	ELIGARD 7.5 MG SYRINGE
FOREST PHARMACEUTICALS INC	00456064808	ELIXOPHYLLIN GG 100/100 LIQ
FOREST PHARMACEUTICALS INC	00456064816	ELIXOPHYLLIN GG 100/100 LIQ
FOREST PHARMACEUTICALS INC	00456064508	ELIXOPHYLLIN-KI ELIXIR
JOHNSON & JOHNSON GROUP	17314930001	ELMIRON 100 MG CAPSULE
SCHERING CORP	00085056701	ELOCON 0.1% CREAM
SCHERING CORP	00085056702	ELOCON 0.1% CREAM
SCHERING CORP	00085085401	ELOCON 0.1% LOTION
SCHERING CORP	00085085402	ELOCON 0.1% LOTION
SCHERING CORP	00085037001	ELOCON 0.1% OINTMENT
SCHERING CORP	00085037002	ELOCON 0.1% OINTMENT
ASTRAZENECA LP	00186151601	EMLA CREAM
ASTRAZENECA LP	00186151501	EMLA CREAM W/TEGADERM
ASTRAZENECA LP	00186151503	EMLA CREAM W/TEGADERM
IMMUNEX CORP	58408042534	ENBREL 25 MG KIT
IMMUNEX CORP	58408042541	ENBREL 25 MG KIT
ASTRAZENECA LP	00186070210	ENTOCORT EC 3 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173047100	EPIVIR 10 MG/ML ORAL SOLN

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173047001	EPIVIR 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173066200	EPIVIR HBV 100 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173066300	EPIVIR HBV 25 MG/5 ML SOLN
JOHNSON & JOHNSON GROUP	50458027036	ERGAMISOL 50MG TABLET
WARNER CHILCOTT INC	00430069624	ERYC 250 MG CAPSULE EC
JOHNSON & JOHNSON GROUP	00062118501	ERYCETTE 2% PLEDGETS
FOREST PHARMACEUTICALS INC	00456063001	ESGIC TABLET
FOREST PHARMACEUTICALS INC	00535001101	ESGIC TABLET
FOREST PHARMACEUTICALS INC	00456067801	ESGIC-PLUS TABLET
WARNER CHILCOTT INC	00430375411	ESTRACE 0.01% CREAM
WARNER CHILCOTT INC	00430375414	ESTRACE 0.01% CREAM
WARNER CHILCOTT INC	00430002324	ESTRACE 1 MG TABLET
WARNER CHILCOTT INC	00430002330	ESTRACE 1 MG TABLET
WARNER CHILCOTT INC	00430002424	ESTRACE 2 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083231008	ESTRADERM 0.05 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00083231082	ESTRADERM 0.05 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00083232008	ESTRADERM 0.1 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00083232062	ESTRADERM 0.1 MG PATCH
PFIZER LABORATORIES DIV PFIZER INC	00071092815	ESTROSTEP FE-28 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071092847	ESTROSTEP FE-28 TABLET
BAXTER HEALTHCARE CORP	10019035060	ETHRANE INHALATION
SCHERING CORP	00085052503	EULEXIN 125 MG CAPSULE
SCHERING CORP	00085052505	EULEXIN 125 MG CAPSULE
SCHERING CORP	00085052506	EULEXIN 125 MG CAPSULE
ELI LILLY AND CO	00002416502	EVISTA 60 MG TABLET
ELI LILLY AND CO	00002416507	EVISTA 60 MG TABLET
ELI LILLY AND CO	00002416530	EVISTA 60 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078032306	EXELON 1.5 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078032344	EXELON 1.5 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078033931	EXELON 2 MG/ML ORAL SOLUTION
NOVARTIS PHARMACEUTICALS CORP	00078032406	EXELON 3 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078032444	EXELON 3 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078032506	EXELON 4.5 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078032544	EXELON 4.5 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078032606	EXELON 6 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078032644	EXELON 6 MG CAPSULE
HOFFMANN LA ROCHE INC	00004016103	FANSIDAR 500/25 TABLET
NOVARTIS PHARMACEUTICALS CORP	00078024915	FEMARA 2.5 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00430054414	FEMHRT 1/5 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00430054423	FEMHRT 1/5 TABLET
WARNER CHILCOTT INC	00430620140	FEMRING 0.05 MG VAGINAL RING
WARNER CHILCOTT INC	00430620240	FEMRING 0.10 MG VAGINAL RING
ABBOTT LABORATORIES	00074707930	FERO-FOLIC-500 FILMTAB
NOVARTIS PHARMACEUTICALS CORP	00078010305	FIORINAL CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078010306	FIORINAL CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078010705	FIORINAL/CODEINE #3 CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025183131	FLAGYL 250 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025183150	FLAGYL 250 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025183155	FLAGYL 250 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025194234	FLAGYL 375 CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025194250	FLAGYL 375 CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025182131	FLAGYL 500 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025182150	FLAGYL 500 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025182151	FLAGYL 500 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025196130	FLAGYL ER 750 MG TABLET SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173045301	FLONASE 0.05% NASAL SPRAY
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173050900	FLOVENT 100 MCG ROTADISK
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173049400	FLOVENT 110 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173049800	FLOVENT 110 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173049500	FLOVENT 220 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173049900	FLOVENT 220 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173050400	FLOVENT 250 MCG ROTADISK
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173049100	FLOVENT 44 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173049700	FLOVENT 44 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173051100	FLOVENT 50 MCG ROTADISK
JOHNSON & JOHNSON GROUP	00062154002	FLOXIN 200 MG TABLET
JOHNSON & JOHNSON GROUP	00062154102	FLOXIN 300 MG TABLET
JOHNSON & JOHNSON GROUP	00062154201	FLOXIN 400 MG TABLET
FOREST PHARMACEUTICALS INC	00456052101	FLUMADINE 100 MG TABLET
FOREST PHARMACEUTICALS INC	00456052708	FLUMADINE 50 MG/5 ML SYRUP
NOVARTIS PHARMACEUTICALS CORP	00078038205	FOCALIN 10 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078038005	FOCALIN 2.5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078038105	FOCALIN 5 MG TABLET
SCHERING CORP	00085140101	FORADIL AEROLIZER 12 MCG CAP
SCHERING CORP	00085140201	FORADIL AEROLIZER 12 MCG CAP
HOFFMANN LA ROCHE INC	00004024648	FORTOVASE 200 MG SOFTGEL CAP
NOVARTIS PHARMACEUTICALS CORP	00078037366	GLEEVEC 100 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00087607111	GLUCOPHAGE 1,000 MG TABLET
BRISTOL MYERS SQUIBB CO	00087606005	GLUCOPHAGE 500 MG TABLET
BRISTOL MYERS SQUIBB CO	00087606010	GLUCOPHAGE 500 MG TABLET
BRISTOL MYERS SQUIBB CO	00087607005	GLUCOPHAGE 850 MG TABLET
BRISTOL MYERS SQUIBB CO	00087607211	GLUCOVANCE 1.25/250 MG TAB
BRISTOL MYERS SQUIBB CO	00087607311	GLUCOVANCE 2.5/500 MG TAB
BRISTOL MYERS SQUIBB CO	00087607411	GLUCOVANCE 5/500 MG TAB
JOHNSON & JOHNSON GROUP	00062020604	GRIFULVIN V 125 MG/5 ML SUSP
PROMETHEUS LABORATORIES INC	65483049514	HELIDAC THERAPY

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
US PHARMACEUTICAL CORP	52747060060	HEMOCYTE PLUS CAPSULE
US PHARMACEUTICAL CORP	52747030830	HEMOCYTE PLUS TABULE
US PHARMACEUTICAL CORP	52747030870	HEMOCYTE PLUS TABULE
US PHARMACEUTICAL CORP	52747030830	HEMOCYTE-F TABLET
US PHARMACEUTICAL CORP	52747030670	HEMOCYTE-F TABLET
GILEAD SCIENCES INC	61958050101	HEPSERA 10 MG TABLET
MERRELL PHARMACEUTICALS INC	00068027761	HIPREX 1 GM TABLET
HOFFMANN LA ROCHE INC	00004022001	HIVID 0.375 MG TABLET
HOFFMANN LA ROCHE INC	00004022101	HIVID 0.750 MG TABLET
SANOFI SYNTHELABO INC	00024079202	HYTAKEROL 0.125 MG CAPSULE
ABBOTT LABORATORIES	00074712530	IBERET-FOLIC 500 FILMTAB
HAWTHORN PHARMACEUTICALS	63717015003	ICAR PRENATAL COMBO PACK
HAWTHORN PHARMACEUTICALS	63717011201	ICAR-C PLUS SR CAPSULE
SCHERING CORP	00085115303	IMDUR 120 MG TABLET SA
SCHERING CORP	00085115304	IMDUR 120 MG TABLET SA
SCHERING CORP	00085330601	IMDUR 30 MG TABLET SA
SCHERING CORP	00085330603	IMDUR 30 MG TABLET SA
SCHERING CORP	00085411001	IMDUR 60 MG TABLET SA
SCHERING CORP	00085411003	IMDUR 60 MG TABLET SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173045003	IMITREX 100 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173052300	IMITREX 20 MG NASAL SPRAY
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173046002	IMITREX 25 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173052400	IMITREX 5 MG NASAL SPRAY
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173045900	IMITREX 50 MG TABLET
PROMETHEUS LABORATORIES INC	65483059010	IMURAN 50 MG TABLET
MERRELL PHARMACEUTICALS INC	60793001114	INTAL INHALER
MERRELL PHARMACEUTICALS INC	00585067302	INTAL NEBULIZER SOLUTION
MERRELL PHARMACEUTICALS INC	00585067303	INTAL NEBULIZER SOLUTION
HOFFMANN LA ROCHE INC	00004024515	INVIRASE 200 MG CAPSULE
SCHERING CORP	00085026301	K-DUR 10 MEQ TABLET SA
SCHERING CORP	00085026381	K-DUR 10 MEQ TABLET SA
SCHERING CORP	00085078701	K-DUR 20 MEQ TABLET SA
SCHERING CORP	00085078706	K-DUR 20 MEQ TABLET SA
SCHERING CORP	00085078710	K-DUR 20 MEQ TABLET SA
SCHERING CORP	00085078781	K-DUR 20 MEQ TABLET SA
PFIZER LABORATORIES DIV PFIZER INC	00024230110	KERLONE 10 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00024230020	KERLONE 20 MG TABLET
HOFFMANN LA ROCHE INC	00004006801	KLONOPIN 0.5 MG TABLET
HOFFMANN LA ROCHE INC	00004005801	KLONOPIN 1 MG TABLET
HOFFMANN LA ROCHE INC	00004009801	KLONOPIN 2 MG TABLET
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072573028	LAC-HYDRIN 12% CREAM
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072573038	LAC-HYDRIN 12% CREAM
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072570801	LAC-HYDRIN 12% LOTION
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072571206	LAC-HYDRIN 12% LOTION
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072571214	LAC-HYDRIN 12% LOTION
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072571401	LAC-HYDRIN 12% LOTION
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173064255	LAMICTAL 100 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173064360	LAMICTAL 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173064460	LAMICTAL 200 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173052700	LAMICTAL 25 MG DISPER TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173063302	LAMICTAL 25 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173052600	LAMICTAL 5 MG DISPER TABLET
NOVARTIS PHARMACEUTICALS CORP	00078032882	LAMISIL 1% SOLUTION
NOVARTIS PHARMACEUTICALS CORP	00078017905	LAMISIL 250 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078017915	LAMISIL 250 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028010801	LAMPRENE 50 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024255	LANOXIN 125 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024256	LANOXIN 125 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024275	LANOXIN 125 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024955	LANOXIN 250 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024956	LANOXIN 250 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024975	LANOXIN 250 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173024980	LANOXIN 250 MCG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173026427	LANOXIN 50 MCG/ML ELIXIR
HOFFMANN LA ROCHE INC	00004017202	LARIAM 250 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006710	LASIX 20 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006750	LASIX 20 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006770	LASIX 20 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006011	LASIX 40 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006013	LASIX 40 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006050	LASIX 40 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006070	LASIX 40 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006605	LASIX 80 MG TABLET
MERRELL PHARMACEUTICALS INC	00039006650	LASIX 80 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078017805	LESCOL 20 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078017615	LESCOL 20 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078023405	LESCOL 40 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078023415	LESCOL 40 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078035405	LESCOL XL 80 MG TABLET SA
NOVARTIS PHARMACEUTICALS CORP	00078035415	LESCOL XL 80 MG TABLET SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173083535	LEUKERAN 2 MG TABLET
JOHNSON & JOHNSON GROUP	00045152010	LEVAQUIN 250 MG TABLET
JOHNSON & JOHNSON GROUP	00045152050	LEVAQUIN 250 MG TABLET
JOHNSON & JOHNSON GROUP	00045152510	LEVAQUIN 500 MG TABLET
JOHNSON & JOHNSON GROUP	00045152550	LEVAQUIN 500 MG TABLET
JOHNSON & JOHNSON GROUP	00045153010	LEVAQUIN 750 MG TABLET

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
JOHNSON & JOHNSON GROUP	00045153050	LEVAQUIN 750 MG TABLET
ASTRAZENECA LP	00186000231	LEXCEL 5-2.5 MG TABLET SA
ASTRAZENECA LP	00186000131	LEXCEL 5-5 MG TABLET SA
ASTRAZENECA LP	00186000168	LEXCEL 5-5 MG TABLET SA
PFIZER LABORATORIES DIV PFIZER INC	00071015523	LIPITOR 10 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071015534	LIPITOR 10 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071015540	LIPITOR 10 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071015623	LIPITOR 20 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071015640	LIPITOR 20 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071015723	LIPITOR 40 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071015823	LIPITOR 80 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071091648	LOESTRIN 21 1.5/30 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071091548	LOESTRIN 21 1/20 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071091745	LOESTRIN FE 1.5/30 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071091748	LOESTRIN FE 1.5/30 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071091345	LOESTRIN FE 1/20 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071091348	LOESTRIN FE 1/20 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025006802	LOMOTIL LIQUID
PFIZER LABORATORIES DIV PFIZER INC	00025006131	LOMOTIL TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025006134	LOMOTIL TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025006151	LOMOTIL TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025006152	LOMOTIL TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025006155	LOMOTIL TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071073720	LOPID 600 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071073730	LOPID 600 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028420133	LOPRESSOR 1 MG/ML AMPUL
NOVARTIS PHARMACEUTICALS CORP	00028007101	LOPRESSOR 100 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028007110	LOPRESSOR 100 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028007161	LOPRESSOR 100 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028005101	LOPRESSOR 50 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028005110	LOPRESSOR 50 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00028005301	LOPRESSOR HCT 100/25 TABLET
NOVARTIS PHARMACEUTICALS CORP	00028007301	LOPRESSOR HCT 100/50 TABLET
NOVARTIS PHARMACEUTICALS CORP	00028003501	LOPRESSOR HCT 50/25 TABLET
FOREST PHARMACEUTICALS INC	00785635001	LORCET 10/650 TABLET
FOREST PHARMACEUTICALS INC	00785635050	LORCET 10/650 TABLET
FOREST PHARMACEUTICALS INC	00785635063	LORCET 10/650 TABLET
FOREST PHARMACEUTICALS INC	00785112201	LORCET PLUS TABLET
FOREST PHARMACEUTICALS INC	00785112250	LORCET PLUS TABLET
FOREST PHARMACEUTICALS INC	00785112263	LORCET PLUS TABLET
FOREST PHARMACEUTICALS INC	00785112001	LORCET-HD CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00083006330	LOTENSIN 10 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083006332	LOTENSIN 10 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083006390	LOTENSIN 10 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083007930	LOTENSIN 20 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083007932	LOTENSIN 20 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083007990	LOTENSIN 20 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083009430	LOTENSIN 40 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083009432	LOTENSIN 40 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083009490	LOTENSIN 40 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083005930	LOTENSIN 5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083005932	LOTENSIN 5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083005990	LOTENSIN 5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083007230	LOTENSIN HCT 10/12.5 TABLET
NOVARTIS PHARMACEUTICALS CORP	00083007430	LOTENSIN HCT 20/12.5 TABLET
NOVARTIS PHARMACEUTICALS CORP	00083007530	LOTENSIN HCT 20/25 TABLET
NOVARTIS PHARMACEUTICALS CORP	00083005730	LOTENSIN HCT 5/6.25 TABLET
NOVARTIS PHARMACEUTICALS CORP	00083225530	LOTREL 2.5/10 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00083226030	LOTREL 5/10 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00083226530	LOTREL 5/20 MG CAPSULE
SCHERING CORP	00085092401	LOTRISONE CREAM
SCHERING CORP	00085092402	LOTRISONE CREAM
SCHERING CORP	00085080901	LOTRISONE LOTION
BRISTOL MYERS SQUIBB CO	00015308060	LYSODREN 500 MG TABLET
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149071001	MACROBID 100 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149000905	MACRODANTIN 100 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149000967	MACRODANTIN 100 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149000705	MACRODANTIN 25 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149000805	MACRODANTIN 50 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149000866	MACRODANTIN 50 MG CAPSULE
PROCTER AND GAMBLE PHARMACEUTICALS INC SUB PROCTER AND GAMBLE CO	00149000867	MACRODANTIN 50 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173067501	MALARONE 250-100 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173067601	MALARONE 62.5-25 MG PED TAB
WARNER CHILCOTT INC	00430016624	MANDELAMINE 500 MG TABLET
3M PHARMACEUTICALS	00089081521	MAXAIR AUTOHALER 0.2 MG AERO
MCR AMERICAN PHARMACEUTICALS INC	58605052001	MAXIFED 700/80 TABLET SA
MCR AMERICAN PHARMACEUTICALS INC	58605052801	MAXIFED DM TABLET SA
MCR AMERICAN PHARMACEUTICALS INC	58605051401	MAXIFED-G TABLET SA
OVATION PHARMACEUTICALS INC	67386080302	MEBARAL 100 MG TABLET
OVATION PHARMACEUTICALS INC	67386080102	MEBARAL 32 MG TABLET
OVATION PHARMACEUTICALS INC	67386080202	MEBARAL 50 MG TABLET
BERTEK PHARMACEUTICALS INC	62794015102	MENTAX 1% CREAM
BERTEK PHARMACEUTICALS INC	62794015103	MENTAX 1% CREAM
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173066518	MEPRON 750 MG/5 ML SUSPENSION
NOVARTIS PHARMACEUTICALS CORP	00078005405	METHERGINE 0.2 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078005303	METHERGINE 0.2 MG/ML AMPUL

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
3M PHARMACEUTICALS	00089020025	METROGEL-VAGINAL 0.75% GEL
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597006601	MEXITIL 150 MG CAPSULE
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597006701	MEXITIL 200 MG CAPSULE
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597006801	MEXITIL 250 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078031190	MIACALCIN 200 UNITS NASAL SPRA
ABBOTT LABORATORIES	00597003928	MICARDIS 20 MG TABLET
ABBOTT LABORATORIES	00597004028	MICARDIS 40 MG TABLET
ABBOTT LABORATORIES	00597004128	MICARDIS 80 MG TABLET
ABBOTT LABORATORIES	00597004328	MICARDIS HCT 40/12.5 MG TAB
ABBOTT LABORATORIES	00597004428	MICARDIS HCT 80/12.5 MG TAB
WATSON LABORATORIES INC	52544062201	MICROZIDE 12.5 MG CAPSULE
XCEL PHARMACEUTICALS	66490024598	MIGRANAL 4 MG/ML NASAL SPRAY
ORGANON USA INC	00052028106	MIRCETTE 28 DAY TABLET
ABBOTT LABORATORIES	00597003001	MOBIC 15 MG TABLET
ABBOTT LABORATORIES	00597002901	MOBIC 7.5 MG TABLET
JOHNSON & JOHNSON GROUP	00062171415	MODICON 28 TABLET
JOHNSON & JOHNSON GROUP	00107171427	MODICON 28 TABLET
JOHNSON & JOHNSON GROUP	00062543701	MONISTAT 3 200 MG VAG SUPP
JOHNSON & JOHNSON GROUP	00062543401	MONISTAT-DERM 2% CREAM
JOHNSON & JOHNSON GROUP	00062543402	MONISTAT-DERM 2% CREAM
JOHNSON & JOHNSON GROUP	00062543403	MONISTAT-DERM 2% CREAM
WATSON LABORATORIES INC	55515025904	MONODOX 100 MG CAPSULE
WATSON LABORATORIES INC	55515026006	MONODOX 50 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00087015846	MONOPRIL 10 MG TABLET
BRISTOL MYERS SQUIBB CO	00087015885	MONOPRIL 10 MG TABLET
BRISTOL MYERS SQUIBB CO	00087060942	MONOPRIL 20 MG TABLET
BRISTOL MYERS SQUIBB CO	00087060945	MONOPRIL 20 MG TABLET
BRISTOL MYERS SQUIBB CO	00087060985	MONOPRIL 20 MG TABLET
BRISTOL MYERS SQUIBB CO	00087120213	MONOPRIL 40 MG TABLET
BRISTOL MYERS SQUIBB CO	00087149201	MONOPRIL HCT 10/12.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00087149301	MONOPRIL HCT 20/12.5 MG TABLET
FOREST PHARMACEUTICALS INC	00456430008	MONUROL 3 GM SACHET
JOHNSON & JOHNSON GROUP	17314940001	MYCELEX 10 MG TROCHE
JOHNSON & JOHNSON GROUP	17314940002	MYCELEX 10 MG TROCHE
JOHNSON & JOHNSON GROUP	17314940003	MYCELEX 10 MG TROCHE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173071325	MYLERAN 2 MG TABLET
SANOFI SYNTHELABO INC	00024128704	MYTELASE 10 MG CAPLET
HOFFMANN LA ROCHE INC	00004631301	NAPROSYN 250 MG TABLET
HOFFMANN LA ROCHE INC	00004631114	NAPROSYN 375 MG TABLET
HOFFMANN LA ROCHE INC	00004631014	NAPROSYN 500 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071027024	NARDIL 15 MG TABLET
MERRELL PHARMACEUTICALS INC	00075150616	NASACORT AQ NASAL SPRAY
MERRELL PHARMACEUTICALS INC	00075150543	NASACORT NASAL INHALER
SCHERING CORP	00085119701	NASONEX 50 MCG NASAL SPRAY
WARNER CHILCOTT INC	00430022723	NATACHEW TABLET CHEW
WARNER CHILCOTT INC	00430022640	NATAFORT TABLET
SANOFI SYNTHELABO INC	00024132203	NEGGRAM 500 MG CAPLET
SANOFI SYNTHELABO INC	00024135901	NEO-SYNEPHRINE 10% EYE DROP
SANOFI SYNTHELABO INC	00024136201	NEO-SYNEPHRINE 10% EYE DROP
SANOFI SYNTHELABO INC	00024135801	NEO-SYNEPHRINE 2.5% EYE DRP
PFIZER LABORATORIES DIV PFIZER INC	00071080324	NEURONTIN 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071080340	NEURONTIN 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071080524	NEURONTIN 300 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071080540	NEURONTIN 300 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071080624	NEURONTIN 400 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071080640	NEURONTIN 400 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071041624	NEURONTIN 600 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071042624	NEURONTIN 800 MG TABLET
ASTRAZENECA LP	00186502031	NEXIUM 20 MG CAPSULE
ASTRAZENECA LP	00186502054	NEXIUM 20 MG CAPSULE
ASTRAZENECA LP	00186502082	NEXIUM 20 MG CAPSULE
ASTRAZENECA LP	00186502228	NEXIUM 20 MG CAPSULE
ASTRAZENECA LP	00186504031	NEXIUM 40 MG CAPSULE
ASTRAZENECA LP	00186504054	NEXIUM 40 MG CAPSULE
ASTRAZENECA LP	00186504082	NEXIUM 40 MG CAPSULE
ASTRAZENECA LP	00186504228	NEXIUM 40 MG CAPSULE
KOS PHARMACEUTICALS INC	60598000301	NIASPAN 1,000 MG TABLET SA
KOS PHARMACEUTICALS INC	60598000101	NIASPAN 500 MG TABLET SA
KOS PHARMACEUTICALS INC	60598000201	NIASPAN 750 MG TABLET SA
MERRELL PHARMACEUTICALS INC	00088111114	NILANDRON 150 MG TABLET
SCHERING CORP	00085331530	NITRO-DUR 0.3 MG/HR PATCH
SCHERING CORP	00085331535	NITRO-DUR 0.3 MG/HR PATCH
SCHERING CORP	00085081930	NITRO-DUR 0.8 MG/HR PATCH
SCHERING CORP	00085081935	NITRO-DUR 0.8 MG/HR PATCH
JOHNSON & JOHNSON GROUP	50458022115	NIZORAL 2% CREAM
JOHNSON & JOHNSON GROUP	50458022130	NIZORAL 2% CREAM
JOHNSON & JOHNSON GROUP	50458022160	NIZORAL 2% CREAM
JOHNSON & JOHNSON GROUP	50458022304	NIZORAL 2% SHAMPOO
JOHNSON & JOHNSON GROUP	50458022010	NIZORAL 200 MG TABLET
ASTRAZENECA LP	00310060018	NOLVADEX 10 MG TABLET
ASTRAZENECA LP	00310060060	NOLVADEX 10 MG TABLET
ASTRAZENECA LP	00310060075	NOLVADEX 10 MG TABLET
ASTRAZENECA LP	00310060412	NOLVADEX 20 MG TABLET
ASTRAZENECA LP	00310060430	NOLVADEX 20 MG TABLET
ASTRAZENECA LP	00310060490	NOLVADEX 20 MG TABLET
WATSON LABORATORIES INC	52544053901	NORCO 10/325 TABLET

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
WATSON LABORATORIES INC	52544053905	NORCO 10/325 TABLET
WATSON LABORATORIES INC	52544026528	NORINYL 1+50-28 TABLET
PFIZER LABORATORIES DIV PFIZER INC	00025275231	NORPACE 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025275252	NORPACE 100 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025276231	NORPACE 150 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025273231	NORPACE CR 100 MG CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00025273234	NORPACE CR 100 MG CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00025273251	NORPACE CR 100 MG CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00025274231	NORPACE CR 150 MG CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00025274234	NORPACE CR 150 MG CAPSULE SA
PFIZER LABORATORIES DIV PFIZER INC	00025274251	NORPACE CR 150 MG CAPSULE SA
MERRELL PHARMACEUTICALS INC	00068000701	NORPRAMIN 10 MG TABLET
MERRELL PHARMACEUTICALS INC	000680002001	NORPRAMIN 100 MG TABLET
MERRELL PHARMACEUTICALS INC	000680002150	NORPRAMIN 150 MG TABLET
MERRELL PHARMACEUTICALS INC	00068001101	NORPRAMIN 25 MG TABLET
MERRELL PHARMACEUTICALS INC	00068001501	NORPRAMIN 50 MG TABLET
MERRELL PHARMACEUTICALS INC	00068001901	NORPRAMIN 75 MG TABLET
JOHNSON & JOHNSON GROUP	00062190315	ORTHO TRI-CYCLEN 28 TABLET
JOHNSON & JOHNSON GROUP	00062179615	ORTHO-CEPT 28 DAY TABLET
JOHNSON & JOHNSON GROUP	00062190115	ORTHO-CYCLEN 28 TABLET
JOHNSON & JOHNSON GROUP	00062176115	ORTHO-NOVUM 1/35-28 TABLET
JOHNSON & JOHNSON GROUP	00107176104	ORTHO-NOVUM 1/35-28 TABLET
JOHNSON & JOHNSON GROUP	00107176107	ORTHO-NOVUM 1/35-28 TABLET
JOHNSON & JOHNSON GROUP	00107176127	ORTHO-NOVUM 1/35-28 TABLET
JOHNSON & JOHNSON GROUP	00062133215	ORTHO-NOVUM 1/50-28 TABLET
JOHNSON & JOHNSON GROUP	00062133220	ORTHO-NOVUM 1/50-28 TABLET
JOHNSON & JOHNSON GROUP	00107133207	ORTHO-NOVUM 1/50-28 TABLET
JOHNSON & JOHNSON GROUP	00107133227	ORTHO-NOVUM 1/50-28 TABLET
JOHNSON & JOHNSON GROUP	00062177115	ORTHO-NOVUM 10/11-28 TABLET
JOHNSON & JOHNSON GROUP	00062178115	ORTHO-NOVUM 7/7/7-28 TABLET
JOHNSON & JOHNSON GROUP	00062178120	ORTHO-NOVUM 7/7/7-28 TABLET
JOHNSON & JOHNSON GROUP	00062178122	ORTHO-NOVUM 7/7/7-28 TABLET
WARNER CHILCOTT INC	00430058214	OVCON-35 28 TABLET
WARNER CHILCOTT INC	00430058514	OVCON-50 28 TABLET
PAN AMERICAN LABORATORIES INC	00525942216	PANCOF HC LIQUID
PAN AMERICAN LABORATORIES INC	00525975816	PANCOF XP LIQUID
JOHNSON & JOHNSON GROUP	00045034260	PANCREASE MT 10 CAPSULE EC
JOHNSON & JOHNSON GROUP	00045034360	PANCREASE MT 16 CAPSULE EC
JOHNSON & JOHNSON GROUP	00045034660	PANCREASE MT 20 CAPSULE EC
JOHNSON & JOHNSON GROUP	00045034160	PANCREASE MT 4 CAPSULE EC
PAN AMERICAN LABORATORIES INC	00525079516	PANMIST DM SYRUP
PAN AMERICAN LABORATORIES INC	00525076801	PANMIST JR 595/48 TABLET
PAN AMERICAN LABORATORIES INC	00525079201	PANMIST LA 795/85 TABLET
JOHNSON & JOHNSON GROUP	00045032560	PARAFON FORTE DSC 500 MG CPT
NOVARTIS PHARMACEUTICALS CORP	00078001705	PARLODEL 2.5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078001715	PARLODEL 2.5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078010205	PARLODEL 5 MG CAPSULE
NOVARTIS PHARMACEUTICALS CORP	00078010215	PARLODEL 5 MG CAPSULE
SANOFI SYNTHELABO INC	00024150906	PEDIAACOF LIQUID
ZYBER PHARMACEUTICAL INC	65224017516	PEDIATEX LIQUID
ZYBER PHARMACEUTICAL INC	65224045716	PEDIATEX-D LIQUID
ATLEY PHARMACEUTICALS INC	59702015201	PEDIOX CHEWABLE TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597001701	PERSANTINE 25 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597001801	PERSANTINE 50 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597001901	PERSANTINE 75 MG TABLET
SANOFI SYNTHELABO INC	00024153502	PHISOHEX 3% CLEANSER
SANOFI SYNTHELABO INC	00024153506	PHISOHEX 3% CLEANSER
SANOFI SYNTHELABO INC	00024153508	PHISOHEX 3% CLEANSER
SANOFI SYNTHELABO INC	00024153524	PHISOHEX 3% CLEANSER
SANOFI SYNTHELABO INC	00024153548	PHISOHEX 3% CLEANSER
SANOFI SYNTHELABO INC	00024156210	PLAQUENIL 200 MG TABLET
BRISTOL MYERS SQUIBB CO	63653117101	PLAVIX 75 MG TABLET
BRISTOL MYERS SQUIBB CO	63653117103	PLAVIX 75 MG TABLET
BRISTOL MYERS SQUIBB CO	63653117105	PLAVIX 75 MG TABLET
BRISTOL MYERS SQUIBB CO	63653117106	PLAVIX 75 MG TABLET
ASTRAZENECA LP	00186045228	PLENDIL 10 MG TABLET SA
ASTRAZENECA LP	00186045231	PLENDIL 10 MG TABLET SA
ASTRAZENECA LP	00186045258	PLENDIL 10 MG TABLET SA
ASTRAZENECA LP	00186045028	PLENDIL 2.5 MG TABLET SA
ASTRAZENECA LP	00186045031	PLENDIL 2.5 MG TABLET SA
ASTRAZENECA LP	00186045058	PLENDIL 2.5 MG TABLET SA
ASTRAZENECA LP	00186045128	PLENDIL 5 MG TABLET SA
ASTRAZENECA LP	00186045131	PLENDIL 5 MG TABLET SA
ASTRAZENECA LP	00186045158	PLENDIL 5 MG TABLET SA
JOHNSON & JOHNSON GROUP	17314932201	POLYCITRA SYRUP
JOHNSON & JOHNSON GROUP	17314932001	POLYCITRA-K CRYSTALS PACKET
JOHNSON & JOHNSON GROUP	17314932101	POLYCITRA-K SOLUTION
JOHNSON & JOHNSON GROUP	17314932301	POLYCITRA-LC SOLUTION S/F
BRISTOL MYERS SQUIBB CO	00087048741	POLY-VI-FLOR 0.25 MG TAB CHW
BRISTOL MYERS SQUIBB CO	00087046841	POLY-VI-FLOR 0.5 MG TABLET
BRISTOL MYERS SQUIBB CO	00087047402	POLY-VI-FLOR 1 MG TABLET
BRISTOL MYERS SQUIBB CO	00087048841	POLY-VI-FLOR/IRON 0.25 MG TB
FERNDAL LABORATORIES INC	00496071603	PRAMOSONE 1% CREAM
FERNDAL LABORATORIES INC	00496071604	PRAMOSONE 1% CREAM
FERNDAL LABORATORIES INC	00496072903	PRAMOSONE 1% LOTION
FERNDAL LABORATORIES INC	00496072904	PRAMOSONE 1% LOTION

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
FERNDALE LABORATORIES INC	00496072906	PRAMOSONE 1% LOTION
FERNDALE LABORATORIES INC	00496076304	PRAMOSONE 1% OINTMENT
FERNDALE LABORATORIES INC	00496071703	PRAMOSONE 2.5% CREAM
FERNDALE LABORATORIES INC	00496071704	PRAMOSONE 2.5% CREAM
FERNDALE LABORATORIES INC	00496072604	PRAMOSONE 2.5% LOTION
FERNDALE LABORATORIES INC	00496072606	PRAMOSONE 2.5% LOTION
FERNDALE LABORATORIES INC	00496077704	PRAMOSONE 2.5% OINTMENT
NOVO NORDISK PHARMACEUTICAL INDUSTRIES INC	00169008181	PRANDIN 0.5 MG TABLET
NOVO NORDISK PHARMACEUTICAL INDUSTRIES INC	00169008281	PRANDIN 1 MG TABLET
NOVO NORDISK PHARMACEUTICAL INDUSTRIES INC	00169008481	PRANDIN 2 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026266251	PRECOSE 100 MG TABLET
BAYER CORP PHARMACEUTICAL DIV	00026266148	PRECOSE 50 MG TABLET
MONARCH PHARMACEUTICALS INC	61570012563	PREFEST TABLET
FIRST HORIZON PHARMACEUTICAL CORP	59630042090	PRENATE ADVANCE TABLET
TAP PHARMACEUTICALS INC	00300154111	PREVACID 15 MG CAPSULE DR
TAP PHARMACEUTICALS INC	00300154119	PREVACID 15 MG CAPSULE DR
TAP PHARMACEUTICALS INC	00300154130	PREVACID 15 MG CAPSULE DR
TAP PHARMACEUTICALS INC	00300730930	PREVACID 15 MG SUSPENSION DR
TAP PHARMACEUTICALS INC	00300304611	PREVACID 30 MG CAPSULE DR
TAP PHARMACEUTICALS INC	00300304613	PREVACID 30 MG CAPSULE DR
TAP PHARMACEUTICALS INC	00300304619	PREVACID 30 MG CAPSULE DR
TAP PHARMACEUTICALS INC	00300731130	PREVACID 30 MG SUSPENSION DR
MERRELL PHARMACEUTICALS INC	00088210003	PRIFTIN 150 MG TABLET
ASTRAZENECA LP	00186060628	PRIOLOSEC 10 MG CAPSULE DR
ASTRAZENECA LP	00186060631	PRIOLOSEC 10 MG CAPSULE DR
ASTRAZENECA LP	00186060668	PRIOLOSEC 10 MG CAPSULE DR
ASTRAZENECA LP	00186060682	PRIOLOSEC 10 MG CAPSULE DR
ASTRAZENECA LP	00186074228	PRIOLOSEC 20 MG CAPSULE DR
ASTRAZENECA LP	00186074231	PRIOLOSEC 20 MG CAPSULE DR
ASTRAZENECA LP	00186074282	PRIOLOSEC 20 MG CAPSULE DR
ASTRAZENECA LP	00186074328	PRIOLOSEC 40 MG CAPSULE DR
ASTRAZENECA LP	00186074331	PRIOLOSEC 40 MG CAPSULE DR
ASTRAZENECA LP	00186074368	PRIOLOSEC 40 MG CAPSULE DR
ASTRAZENECA LP	00186074382	PRIOLOSEC 40 MG CAPSULE DR
SANOFI SYNTHELABO INC	00024159601	PRIMAQUINE 26.3 MG TABLET
MERCK AND CO INC	00006010628	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006010631	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006010658	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006010672	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006010682	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006010687	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006010694	PRINIVIL 10 MG TABLET
MERCK AND CO INC	00006001528	PRINIVIL 2.5 MG TABLET
MERCK AND CO INC	00006001531	PRINIVIL 2.5 MG TABLET
MERCK AND CO INC	00006001558	PRINIVIL 2.5 MG TABLET
MERCK AND CO INC	00006020728	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006020731	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006020758	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006020772	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006020782	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006020787	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006020794	PRINIVIL 20 MG TABLET
MERCK AND CO INC	00006023758	PRINIVIL 40 MG TABLET
MERCK AND CO INC	00006001928	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006001958	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006001982	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006001986	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006001987	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006001994	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006001972	PRINIVIL 5 MG TABLET
MERCK AND CO INC	00006014531	PRINZIDE 10/12.5 TABLET
MERCK AND CO INC	00006014558	PRINZIDE 10/12.5 TABLET
MERCK AND CO INC	00006014031	PRINZIDE 20/12.5 TABLET
MERCK AND CO INC	00006014058	PRINZIDE 20/12.5 TABLET
MERCK AND CO INC	00006014231	PRINZIDE 20/25 TABLET
MERCK AND CO INC	00006014258	PRINZIDE 20/25 TABLET
WYETH DIV WYETH PHARMACEUTICALS INC	00008084181	PROTONIX 40 MG TABLET EC
WYETH DIV WYETH PHARMACEUTICALS INC	00008084199	PROTONIX 40 MG TABLET EC
SCHERING CORP	00085061402	PROVENTIL 90 MCG INHALER
SCHERING CORP	00085113201	PROVENTIL HFA 90 MCG INHALER
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310402	PROZAC 10 MG PULVULE
ELI LILLY AND CO	00002400602	PROZAC 10 MG TABLET
ELI LILLY AND CO	00002400630	PROZAC 10 MG TABLET
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310501	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310502	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310507	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310530	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310533	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310581	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310582	PROZAC 20 MG PULVULE
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777512058	PROZAC 20 MG/5 ML SOLUTION
DISTA PRODUCTS CO DIV ELI LILLY AND CO	00777310730	PROZAC 40 MG PULVULE
ELI LILLY AND CO	00002300475	PROZAC WEEKLY 90 MG CAPSULE
ASTRAZENECA LP	00186091542	PULMICORT 200 MCG TURBUHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	57844052207	PURINETHOL 50 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	57844052252	PURINETHOL 50 MG TABLET

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
WARNER CHILCOTT INC	00430018124	PYRIDUM 200 MG TABLET
WARNER CHILCOTT INC	00430018215	PYRIDUM PLUS TABLET
BERLEX INC	50419010110	QUINAGLUTE DURA-TABS 324 MG
BERLEX INC	50419010111	QUINAGLUTE DURA-TABS 324 MG
BERLEX INC	50419010125	QUINAGLUTE DURA-TABS 324 MG
BERLEX INC	50419010150	QUINAGLUTE DURA-TABS 324 MG
SCHERING CORP	00085119403	REBETOL 200 MG CAPSULE
SCHERING CORP	00085132704	REBETOL 200 MG CAPSULE
SCHERING CORP	00085135105	REBETOL 200 MG CAPSULE
SCHERING CORP	00085138507	REBETOL 200 MG CAPSULE
JOHNSON & JOHNSON GROUP	00045081015	REGRANEX 0.01% GEL
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173068101	RELENZA 5 MG DISKHALER
ORGANON USA INC	00052010530	REMERON 15 MG TABLET
ORGANON USA INC	00052010590	REMERON 15 MG TABLET
ORGANON USA INC	00052010730	REMERON 30 MG TABLET
ORGANON USA INC	00052010790	REMERON 30 MG TABLET
ORGANON USA INC	00052010930	REMERON 45 MG TABLET
JOHNSON & JOHNSON GROUP	50458039260	REMINYL 12 MG TABLET
JOHNSON & JOHNSON GROUP	50458039060	REMINYL 4 MG TABLET
JOHNSON & JOHNSON GROUP	50458039910	REMINYL 4 MG/ML ORAL SOL
JOHNSON & JOHNSON GROUP	50458039160	REMINYL 8 MG TABLET
JOHNSON & JOHNSON GROUP	00062018702	RENOVA 0.02% CREAM
JOHNSON & JOHNSON GROUP	00062018503	RENOVA 0.05% CREAM
JOHNSON & JOHNSON GROUP	00062018505	RENOVA 0.05% CREAM
JOHNSON & JOHNSON GROUP	00062057544	RETIN-A 0.01% GEL
JOHNSON & JOHNSON GROUP	00062057546	RETIN-A 0.01% GEL
JOHNSON & JOHNSON GROUP	00062016501	RETIN-A 0.025% CREAM
JOHNSON & JOHNSON GROUP	00062016502	RETIN-A 0.025% CREAM
JOHNSON & JOHNSON GROUP	00062047542	RETIN-A 0.025% GEL
JOHNSON & JOHNSON GROUP	00062047545	RETIN-A 0.025% GEL
JOHNSON & JOHNSON GROUP	00062017512	RETIN-A 0.05% CREAM
JOHNSON & JOHNSON GROUP	00062017513	RETIN-A 0.05% CREAM
JOHNSON & JOHNSON GROUP	00062007507	RETIN-A 0.05% LIQUID
JOHNSON & JOHNSON GROUP	00062027501	RETIN-A 0.1% CREAM
JOHNSON & JOHNSON GROUP	00062027523	RETIN-A 0.1% CREAM
JOHNSON & JOHNSON GROUP	00062019002	RETIN-A MICRO 0.1% GEL
JOHNSON & JOHNSON GROUP	00062019003	RETIN-A MICRO 0.1% GEL
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173011318	RETROVIR 10 MG/ML SYRUP
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173010855	RETROVIR 100 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173010856	RETROVIR 100 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173050100	RETROVIR 300 MG TABLET
ASTRAZENECA LP	00186107509	RHINOCORT NASAL INHALER
PROMETHEUS LABORATORIES INC	65483009306	RIDAURA 3 MG CAPSULE
MERRELL PHARMACEUTICALS INC	00068051030	RIFADIN 150 MG CAPSULE
MERRELL PHARMACEUTICALS INC	00068050830	RIFADIN 300 MG CAPSULE
MERRELL PHARMACEUTICALS INC	00068050860	RIFADIN 300 MG CAPSULE
MERRELL PHARMACEUTICALS INC	00068050861	RIFADIN 300 MG CAPSULE
MERRELL PHARMACEUTICALS INC	00068050960	RIFAMATE CAPSULE
MERRELL PHARMACEUTICALS INC	00088057641	RIFATER TABLET
JOHNSON & JOHNSON GROUP	50458030104	RISPERDAL 0.25 MG TABLET
JOHNSON & JOHNSON GROUP	50458030150	RISPERDAL 0.25 MG TABLET
JOHNSON & JOHNSON GROUP	50458030206	RISPERDAL 0.5 MG TABLET
JOHNSON & JOHNSON GROUP	50458030250	RISPERDAL 0.5 MG TABLET
JOHNSON & JOHNSON GROUP	50458030001	RISPERDAL 1 MG TABLET
JOHNSON & JOHNSON GROUP	50458030006	RISPERDAL 1 MG TABLET
JOHNSON & JOHNSON GROUP	50458030050	RISPERDAL 1 MG TABLET
JOHNSON & JOHNSON GROUP	50458030503	RISPERDAL 1 MG/ML SOLUTION
JOHNSON & JOHNSON GROUP	50458032001	RISPERDAL 2 MG TABLET
JOHNSON & JOHNSON GROUP	50458032006	RISPERDAL 2 MG TABLET
JOHNSON & JOHNSON GROUP	50458032050	RISPERDAL 2 MG TABLET
JOHNSON & JOHNSON GROUP	50458033001	RISPERDAL 3 MG TABLET
JOHNSON & JOHNSON GROUP	50458033006	RISPERDAL 3 MG TABLET
JOHNSON & JOHNSON GROUP	50458033050	RISPERDAL 3 MG TABLET
JOHNSON & JOHNSON GROUP	50458035001	RISPERDAL 4 MG TABLET
JOHNSON & JOHNSON GROUP	50458035006	RISPERDAL 4 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083000330	RITALIN 10 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083003430	RITALIN 20 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083000730	RITALIN 5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083001630	RITALIN-SR 20 MG TABLET SA
HOFFMANN LA ROCHE INC	00004014301	ROCALTRON 0.25 MCG CAPSULE
HOFFMANN LA ROCHE INC	00004014323	ROCALTRON 0.25 MCG CAPSULE
HOFFMANN LA ROCHE INC	00004014401	ROCALTRON 0.5 MCG CAPSULE
HOFFMANN LA ROCHE INC	00004911500	ROCALTRON 1 MCG/ML ORAL SOLN
NOVARTIS PHARMACEUTICALS CORP	00078005805	SANSERT 2 MG TABLET
ELI LILLY AND CO	00430043514	SARAFEM 10 MG PULVULE
ELI LILLY AND CO	00430043614	SARAFEM 20 MG PULVULE
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597002001	SERENTIL 10 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597002301	SERENTIL 100 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597002101	SERENTIL 25 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597002504	SERENTIL 25 MG/ML ORAL CONC
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173046400	SEREVENT 21 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173046700	SEREVENT 21 MCG INHALER
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173046500	SEREVENT 21 MCG INHLR REFILL
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173052000	SEREVENT DISKUS 50 MCG
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173052100	SEREVENT DISKUS 50 MCG
ASTRAZENECA LP	00310027110	SEROQUEL 100 MG TABLET

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
ASTRAZENECA LP	00310027139	SEROQUEL 100 MG TABLET
ASTRAZENECA LP	00310027210	SEROQUEL 200 MG TABLET
ASTRAZENECA LP	00310027239	SEROQUEL 200 MG TABLET
ASTRAZENECA LP	00310027510	SEROQUEL 25 MG TABLET
ASTRAZENECA LP	00310027539	SEROQUEL 25 MG TABLET
ASTRAZENECA LP	00310027439	SEROQUEL 300 MG TABLET
ASTRAZENECA LP	00310027460	SEROQUEL 300 MG TABLET
BRISTOL MYERS SQUIBB CO	00087003231	SERZONE 100 MG TABLET
BRISTOL MYERS SQUIBB CO	00087003931	SERZONE 150 MG TABLET
BRISTOL MYERS SQUIBB CO	00087003331	SERZONE 200 MG TABLET
BRISTOL MYERS SQUIBB CO	00087004131	SERZONE 250 MG TABLET
BRISTOL MYERS SQUIBB CO	00087003147	SERZONE 50 MG TABLET
SANOFI SYNTHELABO INC	00024180016	SKELID 200 MG TABLET
HOFFMANN LA ROCHE INC	00004028857	SORIATANE 10 MG CAPSULE
HOFFMANN LA ROCHE INC	63032009125	SORIATANE 25 MG CAPSULE
JOHNSON & JOHNSON GROUP	00062548001	SPECTAZOLE 1% CREAM
JOHNSON & JOHNSON GROUP	00062548002	SPECTAZOLE 1% CREAM
JOHNSON & JOHNSON GROUP	00062548003	SPECTAZOLE 1% CREAM
JOHNSON & JOHNSON GROUP	50458029515	SPORANOX 10 MG/ML SOLUTION
JOHNSON & JOHNSON GROUP	50458029001	SPORANOX 100 MG CAPSULE
JOHNSON & JOHNSON GROUP	50458029004	SPORANOX 100 MG CAPSULE
JOHNSON & JOHNSON GROUP	50458029028	SPORANOX 100 MG CAPSULE
SCOT TUSSIN PHARMACAL CO INC	00372004816	S-T FORTE 2 LIQUID S/F
BRISTOL MYERS SQUIBB CO	00087565041	STADOL NS 10 MG/ML SPRAY
NOVARTIS PHARMACEUTICALS CORP	00078035205	STARLIX 120 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078035105	STARLIX 60 MG TABLET
FIRST HORIZON PHARMACEUTICAL CORP	59630044010	SULAR 10 MG TABLET
FIRST HORIZON PHARMACEUTICAL CORP	00310089139	SULAR 10 MG TABLET SA
FIRST HORIZON PHARMACEUTICAL CORP	59630044110	SULAR 20 MG TABLET
FIRST HORIZON PHARMACEUTICAL CORP	00310089239	SULAR 20 MG TABLET SA
FIRST HORIZON PHARMACEUTICAL CORP	59630044210	SULAR 30 MG TABLET
FIRST HORIZON PHARMACEUTICAL CORP	00310089339	SULAR 30 MG TABLET SA
FIRST HORIZON PHARMACEUTICAL CORP	59630044310	SULAR 40 MG TABLET
BAXTER HEALTHCARE CORP	10019064124	SUPRANE INHALATION LIQUID
ODYSSEY PHARMACEUTICALS INC	65473072001	SURMONTIL 100 MG CAPSULE
ODYSSEY PHARMACEUTICALS INC	65473071801	SURMONTIL 25 MG CAPSULE
ODYSSEY PHARMACEUTICALS INC	65473071901	SURMONTIL 50 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00056047330	SUSTIVA 100 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00056047492	SUSTIVA 200 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00056047030	SUSTIVA 50 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00025016608	SYNAREL 2 MG/ML NASAL SPRAY
SANOFI SYNTHELABO INC	00024193704	TALACEN CAPLET
SANOFI SYNTHELABO INC	00024195104	TALWIN NX TABLET
3M PHARMACEUTICALS	00089030710	TAMBOCOR 100 MG TABLET
3M PHARMACEUTICALS	00089031410	TAMBOCOR 150 MG TABLET
3M PHARMACEUTICALS	00089030510	TAMBOCOR 50 MG TABLET
HOFFMANN LA ROCHE INC	00004080085	TAMIFLU 75 MG GELCAP
HOFFMANN LA ROCHE INC	00004081095	TAMIFLU ORAL SUSPENSION
HOFFMANN LA ROCHE INC	00004592001	TASMAR 100 MG TABLET
HOFFMANN LA ROCHE INC	00004592101	TASMAR 200 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083005230	TEGRETOL 100 MG TABLET CHEW
NOVARTIS PHARMACEUTICALS CORP	00083005232	TEGRETOL 100 MG TABLET CHEW
NOVARTIS PHARMACEUTICALS CORP	00083001976	TEGRETOL 100 MG/5 ML SUSP
NOVARTIS PHARMACEUTICALS CORP	00083002730	TEGRETOL 200 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083002732	TEGRETOL 200 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083002740	TEGRETOL 200 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083006130	TEGRETOL XR 100 MG TABLET SA
NOVARTIS PHARMACEUTICALS CORP	00083006230	TEGRETOL XR 200 MG TABLET SA
NOVARTIS PHARMACEUTICALS CORP	00083006030	TEGRETOL XR 400 MG TABLET SA
SCHERING CORP	00085125901	TEMODAR 100 MG CAPSULE
SCHERING CORP	00085125902	TEMODAR 100 MG CAPSULE
SCHERING CORP	00085124401	TEMODAR 20 MG CAPSULE
SCHERING CORP	00085124402	TEMODAR 20 MG CAPSULE
SCHERING CORP	00085125201	TEMODAR 250 MG CAPSULE
SCHERING CORP	00085125202	TEMODAR 250 MG CAPSULE
SCHERING CORP	00085124801	TEMODAR 5 MG CAPSULE
SCHERING CORP	00085124802	TEMODAR 5 MG CAPSULE
ELAN PHARMACEUTICALS INC	00173043201	TEMOVATE 0.05% SOLUTION
ASTRAZENECA LP	00310011710	TENORETIC 100 TABLET
ASTRAZENECA LP	00310011510	TENORETIC 50 TABLET
ASTRAZENECA LP	00310010110	TENORMIN 100 MG TABLET
ASTRAZENECA LP	00310010710	TENORMIN 25 MG TABLET
ASTRAZENECA LP	00310010510	TENORMIN 50 MG TABLET
ASTRAZENECA LP	00310010534	TENORMIN 50 MG TABLET
MERRELL PHARMACEUTICALS INC	00068069761	TENUATE 25 MG TABLET
MERRELL PHARMACEUTICALS INC	00068069861	TENUATE DOSPAN 75 MG TAB SA
MERRELL PHARMACEUTICALS INC	00068069862	TENUATE DOSPAN 75 MG TAB SA
BRISTOL MYERS SQUIBB CO	00015111750	TEQUIN 200 MG TABLET
BRISTOL MYERS SQUIBB CO	00015111780	TEQUIN 200 MG TABLET
BRISTOL MYERS SQUIBB CO	00015117760	TEQUIN 400 MG TABLET
BRISTOL MYERS SQUIBB CO	00015117780	TEQUIN 400 MG TABLET
JOHNSON & JOHNSON GROUP	00062535101	TERAZOL 3 80 MG SUPPOSITORY
JOHNSON & JOHNSON GROUP	00062535601	TERAZOL 3 CREAM
JOHNSON & JOHNSON GROUP	00062535001	TERAZOL 7 CREAM
FOREST PHARMACEUTICALS INC	00456069801	TESSALON 200 MG CAPSULE
FOREST PHARMACEUTICALS INC	00456068801	TESSALON PERLE 100 MG CAP

Appendix A Drugs by NDC

FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
FOREST PHARMACEUTICALS INC	00456068802	TESSALON PERLE 100 MG CAP
JOHNSON & JOHNSON GROUP	17314460803	TESTODERM 4 MG/24HR PATCH
JOHNSON & JOHNSON GROUP	17314283603	TESTODERM 6 MG/24HR PATCH
JOHNSON & JOHNSON GROUP	17314460903	TESTODERM 6 MG/24HR PATCH
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173088025	THIOGUANINE TABLOID 40 MG TB
FOREST PHARMACEUTICALS INC	00456005001	THYROLAR-1 STRENGTH TABLET
FOREST PHARMACEUTICALS INC	00456004501	THYROLAR-1/2 STRENGTH TAB
FOREST PHARMACEUTICALS INC	00456004001	THYROLAR-1/4 STRENGTH TAB
FOREST PHARMACEUTICALS INC	00456005501	THYROLAR-2 STRENGTH TABLET
FOREST PHARMACEUTICALS INC	00456006001	THYROLAR-3 STRENGTH TABLET
JOHNSON & JOHNSON GROUP	00045041660	TOLECTIN 600 MG TABLET
JOHNSON & JOHNSON GROUP	00045041460	TOLECTIN DS 400 MG CAPSULE
ASTRAZENECA LP	00186070768	TONOCARD 400 MG TABLET
ASTRAZENECA LP	00186070968	TONOCARD 600 MG TABLET
JOHNSON & JOHNSON GROUP	00045064165	TOPAMAX 100 MG TABLET
JOHNSON & JOHNSON GROUP	00045064765	TOPAMAX 15 MG SPRINKLE CAP
JOHNSON & JOHNSON GROUP	00045064265	TOPAMAX 200 MG TABLET
JOHNSON & JOHNSON GROUP	00045064565	TOPAMAX 25 MG SPRINKLE CAP
JOHNSON & JOHNSON GROUP	00045063965	TOPAMAX 25 MG TABLET
ASTRAZENECA LP	00186109205	TOPROL XL 100 MG TABLET SA
ASTRAZENECA LP	00186108805	TOPROL XL 25 MG TABLET SA
ASTRAZENECA LP	00186109005	TOPROL XL 50 MG TABLET SA
HOFFMANN LA ROCHE INC	00004027301	TORADOL 10 MG TABLET
ROXANE LABORATORIES INC	00054474825	TORECAN 10 MG TABLET
PROMETHEUS LABORATORIES INC	65483039110	TRANDATE 100 MG TABLET
PROMETHEUS LABORATORIES INC	65483039111	TRANDATE 100 MG TABLET
PROMETHEUS LABORATORIES INC	65483039150	TRANDATE 100 MG TABLET
PROMETHEUS LABORATORIES INC	65483039210	TRANDATE 200 MG TABLET
PROMETHEUS LABORATORIES INC	65483039222	TRANDATE 200 MG TABLET
PROMETHEUS LABORATORIES INC	65483039250	TRANDATE 200 MG TABLET
PROMETHEUS LABORATORIES INC	65483039310	TRANDATE 300 MG TABLET
PROMETHEUS LABORATORIES INC	65483039333	TRANDATE 300 MG TABLET
PROMETHEUS LABORATORIES INC	65483039350	TRANDATE 300 MG TABLET
MERRELL PHARMACEUTICALS INC	00039007810	TRENTAL 400 MG TABLET SA
MERRELL PHARMACEUTICALS INC	00039007811	TRENTAL 400 MG TABLET SA
NOVARTIS PHARMACEUTICALS CORP	00078033605	TRILEPTAL 150 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078033606	TRILEPTAL 150 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078033705	TRILEPTAL 300 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078033706	TRILEPTAL 300 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078035752	TRILEPTAL 300 MG/5 ML SUSP
NOVARTIS PHARMACEUTICALS CORP	00078033805	TRILEPTAL 600 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00078033806	TRILEPTAL 600 MG TABLET
PURDUE PHARMACEUTICAL PRODUCTS LP	00034051080	TRILISATE 1,000 MG TABLET
PURDUE PHARMACEUTICAL PRODUCTS LP	00034050050	TRILISATE 500 MG TABLET
PURDUE PHARMACEUTICAL PRODUCTS LP	00034050080	TRILISATE 500 MG TABLET
PURDUE PHARMACEUTICAL PRODUCTS LP	00034050550	TRILISATE 750 MG TABLET
PURDUE PHARMACEUTICAL PRODUCTS LP	00034050580	TRILISATE 750 MG TABLET
SCHERING CORP	00085070304	TRINALIN REPETABS
WATSON LABORATORIES INC	52544027428	TRI-NORINYL 28 TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173069100	TRIZIVIR TABLET
SCOT TUSSIN PHARMACAL CO INC	00372001816	TUSSIREX S/F LIQUID
SCOT TUSSIN PHARMACAL CO INC	00372001716	TUSSIREX SYRUP
JOHNSON & JOHNSON GROUP	00045051360	TYLENOL W/CODEINE #3 TABLET
JOHNSON & JOHNSON GROUP	00045051370	TYLENOL W/CODEINE #3 TABLET
JOHNSON & JOHNSON GROUP	00045051372	TYLENOL W/CODEINE #3 TABLET
JOHNSON & JOHNSON GROUP	00045051373	TYLENOL W/CODEINE #3 TABLET
JOHNSON & JOHNSON GROUP	00045051380	TYLENOL W/CODEINE #3 TABLET
JOHNSON & JOHNSON GROUP	00045051560	TYLENOL W/CODEINE #4 TABLET
JOHNSON & JOHNSON GROUP	00045051570	TYLENOL W/CODEINE #4 TABLET
JOHNSON & JOHNSON GROUP	00045050816	TYLENOL W/CODEINE ELIXIR
JOHNSON & JOHNSON GROUP	00045052660	TYLOX 5/500 CAPSULE
JOHNSON & JOHNSON GROUP	00045052679	TYLOX 5/500 CAPSULE
JOHNSON & JOHNSON GROUP	00045065010	ULTRACET TABLET
JOHNSON & JOHNSON GROUP	00045065060	ULTRACET TABLET
JOHNSON & JOHNSON GROUP	00045065910	ULTRAM 50 MG TABLET
JOHNSON & JOHNSON GROUP	00045065960	ULTRAM 50 MG TABLET
JOHNSON & JOHNSON GROUP	00045065970	ULTRAM 50 MG TABLET
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072140015	ULTRAVATE 0.05% CREAM
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072140050	ULTRAVATE 0.05% CREAM
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072145015	ULTRAVATE 0.05% OINTMENT
WESTWOOD SQUIBB PHARMACEUTICALS INC	00072145050	ULTRAVATE 0.05% OINTMENT
ODYSSEY PHARMACEUTICALS INC	65473070301	URECHOLINE 10 MG TABLET
ODYSSEY PHARMACEUTICALS INC	65473070401	URECHOLINE 25 MG TABLET
ODYSSEY PHARMACEUTICALS INC	65473069701	URECHOLINE 5 MG TABLET
ODYSSEY PHARMACEUTICALS INC	65473070001	URECHOLINE 50 MG TABLET
JOHNSON & JOHNSON GROUP	17314922001	URISPAS 100 MG TABLET
HOFFMANN LA ROCHE INC	00004003822	VALCYTE 450 MG TABLET
HOFFMANN LA ROCHE INC	00140000601	VALIUM 10 MG TABLET
HOFFMANN LA ROCHE INC	00140000614	VALIUM 10 MG TABLET
HOFFMANN LA ROCHE INC	00140000401	VALIUM 2 MG TABLET
HOFFMANN LA ROCHE INC	00140000501	VALIUM 5 MG TABLET
HOFFMANN LA ROCHE INC	00140000514	VALIUM 5 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173056502	VALTREX 1 GM CAPLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173093303	VALTREX 500 MG CAPLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173093356	VALTREX 500 MG CAPLET
SCHERING CORP	00085073604	VANCERIL INHALER

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
ELI LILLY AND CO	00002312542	VANCOCCIN HCL 125 MG PULVULE
ELI LILLY AND CO	00002312642	VANCOCCIN HCL 250 MG PULVULE
WOMEN FIRST HEALTHCARE INC	64248015030	VANICA 13.9% CREAM
JOHNSON & JOHNSON GROUP	00045068233	VASCOR 200 MG TABLET
JOHNSON & JOHNSON GROUP	00045068333	VASCOR 300 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173032198	VENTOLIN 90 MCG INH REFILL
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173032188	VENTOLIN 90 MCG INHALER
BRISTOL MYERS SQUIBB CO	00015309145	VEPESID 50 MG CAPSULE
HOFFMANN LA ROCHE INC	00004016851	VERSED 10 MG/5 ML SYRUP
HOFFMANN LA ROCHE INC	00004025001	VESANOID 10 MG CAPSULE
BRISTOL MYERS SQUIBB CO	00087661443	VIDEX 100 MG PACKET
BRISTOL MYERS SQUIBB CO	00087665201	VIDEX 100 MG TABLET CHEWABLE
BRISTOL MYERS SQUIBB CO	00087665301	VIDEX 150 MG TABLET CHEWABLE
BRISTOL MYERS SQUIBB CO	00087661543	VIDEX 167 MG PACKET
BRISTOL MYERS SQUIBB CO	00087663241	VIDEX 2 GM PEDIATRIC SOLN
BRISTOL MYERS SQUIBB CO	00087666515	VIDEX 200 MG TABLET CHEWABLE
BRISTOL MYERS SQUIBB CO	00087665001	VIDEX 25 MG TABLET CHEWABLE
BRISTOL MYERS SQUIBB CO	00087661643	VIDEX 250 MG PACKET
BRISTOL MYERS SQUIBB CO	00087663341	VIDEX 4 GM PEDIATRIC SOLN
BRISTOL MYERS SQUIBB CO	00087665101	VIDEX 50 MG TABLET CHEWABLE
BRISTOL MYERS SQUIBB CO	00087667117	VIDEX EC 125 MG CAP SA
BRISTOL MYERS SQUIBB CO	00087667217	VIDEX EC 200 MG CAP SA
BRISTOL MYERS SQUIBB CO	00087667317	VIDEX EC 250 MG CAP SA
BRISTOL MYERS SQUIBB CO	00087667417	VIDEX EC 400 MG CAP SA
AGOURON PHARMACEUTICALS INC	63010001030	VIRACEPT 250 MG TABLET
AGOURON PHARMACEUTICALS INC	63010001190	VIRACEPT POWDER
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597004601	VIRAMUNE 200 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597004660	VIRAMUNE 200 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597004661	VIRAMUNE 200 MG TABLET
BOEHRINGER INGELHEIM PHARMACEUTICALS INC	00597004724	VIRAMUNE 50 MG/5 ML SUSP
PEDIAMED TM PHARMACEUTICALS INC	66346003158	VIRAVAN-S SUSPENSION
PEDIAMED TM PHARMACEUTICALS INC	66346003165	VIRAVAN-S SUSPENSION
PEDIAMED TM PHARMACEUTICALS INC	66346003223	VIRAVAN-T TABLET CHEWABLE
GILEAD SCIENCES INC	61958040101	VIREAD 300 MG TABLET
ODYSSEY PHARMACEUTICALS INC	65473070201	VIVACTIL 10 MG TABLET
ODYSSEY PHARMACEUTICALS INC	65473070101	VIVACTIL 5 MG TABLET
NOVARTIS PHARMACEUTICALS CORP	00083232508	VIVELLE 0.0375 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00083232582	VIVELLE 0.0375 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00083232708	VIVELLE 0.075 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00083232762	VIVELLE 0.075 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034342	VIVELLE-DOT 0.0375 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034345	VIVELLE-DOT 0.0375 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034442	VIVELLE-DOT 0.05 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034445	VIVELLE-DOT 0.05 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034542	VIVELLE-DOT 0.075 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034545	VIVELLE-DOT 0.075 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034642	VIVELLE-DOT 0.1 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00078034645	VIVELLE-DOT 0.1 MG PATCH
NOVARTIS PHARMACEUTICALS CORP	00028025801	VOLTAREN 25 MG TABLET EC
NOVARTIS PHARMACEUTICALS CORP	00028025801	VOLTAREN 25MG TABLET EC
NOVARTIS PHARMACEUTICALS CORP	00028026201	VOLTAREN 50 MG TABLET EC
NOVARTIS PHARMACEUTICALS CORP	00028016201	VOLTAREN 50MG TABLET EC
NOVARTIS PHARMACEUTICALS CORP	00028026401	VOLTAREN 75 MG TABLET EC
NOVARTIS PHARMACEUTICALS CORP	00028016401	VOLTAREN 75MG TABLET EC
NOVARTIS PHARMACEUTICALS CORP	00028020501	VOLTAREN-XR 100 MG TABLET SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173017855	WELLBUTRIN 100 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173017755	WELLBUTRIN 75 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173094755	WELLBUTRIN SR 100 MG TAB SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173013555	WELLBUTRIN SR 150 MG TAB SA
OVATION PHARMACEUTICALS INC	00024225304	WINSTROL 2 MG TABLET
HOFFMANN LA ROCHE INC	00004110051	XELODA 150 MG TABLET
HOFFMANN LA ROCHE INC	00004110116	XELODA 500 MG TABLET
HOFFMANN LA ROCHE INC	00004025852	XENICAL 120 MG CAPSULE
ASTRAZENECA LP	00186033001	XYLOCAINE 2% JELLY
ASTRAZENECA LP	00186033036	XYLOCAINE 2% JELLY
ASTRAZENECA LP	00186036001	XYLOCAINE 2% VISCOUS SOLN
ASTRAZENECA LP	00186036011	XYLOCAINE 2% VISCOUS SOLN
ASTRAZENECA LP	00186032001	XYLOCAINE 4% SOLUTION
ASTRAZENECA LP	00186031521	XYLOCAINE 5% OINTMENT
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173038354	ZANTAC 15 MG/ML SYRUP
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173042702	ZANTAC 150 MG EFFERDOSE TAB
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173034412	ZANTAC 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173034414	ZANTAC 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173034417	ZANTAC 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173034442	ZANTAC 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173034447	ZANTAC 150 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039306	ZANTAC 300 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039340	ZANTAC 300 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173039347	ZANTAC 300 MG TABLET
PFIZER LABORATORIES DIV PFIZER INC	00071023724	ZARONTIN 250 MG CAPSULE
PFIZER LABORATORIES DIV PFIZER INC	00071241823	ZARONTIN 250 MG/5 ML SYRUP
ASTRAZENECA LP	00310014110	ZESTORETIC 10/12.5 TABLET
ASTRAZENECA LP	00310014210	ZESTORETIC 20/12.5 TABLET
ASTRAZENECA LP	00310014510	ZESTORETIC 20/25 TABLET
ASTRAZENECA LP	00310013110	ZESTRIL 10 MG TABLET
ASTRAZENECA LP	00310013134	ZESTRIL 10 MG TABLET

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FIRM NAME	NDC	DRUG NAME AND DESCRIPTION
ASTRAZENECA LP	00310013139	ZESTRIL 10 MG TABLET
ASTRAZENECA LP	00310013173	ZESTRIL 10 MG TABLET
ASTRAZENECA LP	00310013510	ZESTRIL 2.5 MG TABLET
ASTRAZENECA LP	00310013210	ZESTRIL 20 MG TABLET
ASTRAZENECA LP	00310013234	ZESTRIL 20 MG TABLET
ASTRAZENECA LP	00310013239	ZESTRIL 20 MG TABLET
ASTRAZENECA LP	00310013273	ZESTRIL 20 MG TABLET
ASTRAZENECA LP	00310013310	ZESTRIL 30 MG TABLET
ASTRAZENECA LP	00310013410	ZESTRIL 40 MG TABLET
ASTRAZENECA LP	00310013010	ZESTRIL 5 MG TABLET
ASTRAZENECA LP	00310013034	ZESTRIL 5 MG TABLET
ASTRAZENECA LP	00310013039	ZESTRIL 5 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173086400	ZIAGEN 20 MG/ML SOLUTION
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173086100	ZIAGEN 300 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173086101	ZIAGEN 300 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173086800	ZOFRAN 24 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173044600	ZOFRAN 4 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173044602	ZOFRAN 4 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173044604	ZOFRAN 4 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173048900	ZOFRAN 4 MG/5 ML ORAL SOLN
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173044700	ZOFRAN 8 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173044702	ZOFRAN 8 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173044704	ZOFRAN 8 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173056900	ZOFRAN ODT 4 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173057000	ZOFRAN ODT 8 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173057004	ZOFRAN ODT 8 MG TABLET
ASTRAZENECA LP	00037721020	ZOMIG 2.5 MG TABLET
ASTRAZENECA LP	00037721125	ZOMIG 5 MG TABLET
ASTRAZENECA LP	00310020920	ZOMIG ZMT 2.5 MG TABLET
ASTRAZENECA LP	00310021321	ZOMIG ZMT 5 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173099155	ZOVIRAX 200 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173099156	ZOVIRAX 200 MG CAPSULE
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173095396	ZOVIRAX 200 MG/5 ML SUSP
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173094955	ZOVIRAX 400 MG TABLET
BIOVAIL PHARMACEUTICALS INC	00173099341	ZOVIRAX 5% OINTMENT
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173094555	ZOVIRAX 800 MG TABLET
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173055601	ZYBAN 150 MG TABLET SA
GLAXO WELLCOME DIVISION SMITHKLINE BEECHAM CORP	00173055602	ZYBAN 150 MG TABLET SA
PROMETHEUS LABORATORIES INC	65483099110	ZYLOPRIM 100 MG TABLET
PROMETHEUS LABORATORIES INC	65483099310	ZYLOPRIM 300 MG TABLET
PROMETHEUS LABORATORIES INC	65483099350	ZYLOPRIM 300 MG TABLET
ELI LILLY AND CO	00002411704	ZYPREXA 10 MG TABLET
ELI LILLY AND CO	00002411733	ZYPREXA 10 MG TABLET
ELI LILLY AND CO	00002411760	ZYPREXA 10 MG TABLET
ELI LILLY AND CO	00002441504	ZYPREXA 15 MG TABLET
ELI LILLY AND CO	00002441533	ZYPREXA 15 MG TABLET
ELI LILLY AND CO	00002441560	ZYPREXA 15 MG TABLET
ELI LILLY AND CO	00002411204	ZYPREXA 2.5 MG TABLET
ELI LILLY AND CO	00002411233	ZYPREXA 2.5 MG TABLET
ELI LILLY AND CO	00002411260	ZYPREXA 2.5 MG TABLET
ELI LILLY AND CO	00002442004	ZYPREXA 20 MG TABLET
ELI LILLY AND CO	00002442033	ZYPREXA 20 MG TABLET
ELI LILLY AND CO	00002442060	ZYPREXA 20 MG TABLET
ELI LILLY AND CO	00002411504	ZYPREXA 5 MG TABLET
ELI LILLY AND CO	00002411533	ZYPREXA 5 MG TABLET
ELI LILLY AND CO	00002411560	ZYPREXA 5 MG TABLET
ELI LILLY AND CO	00002411633	ZYPREXA 7.5 MG TABLET
ELI LILLY AND CO	00002411660	ZYPREXA 7.5 MG TABLET
ELI LILLY AND CO	00002445401	ZYPREXA ZYDIS 10 MG TABLET
ELI LILLY AND CO	00002445485	ZYPREXA ZYDIS 10 MG TABLET
ELI LILLY AND CO	00002445501	ZYPREXA ZYDIS 15 MG TAB
ELI LILLY AND CO	00002445585	ZYPREXA ZYDIS 15 MG TAB
ELI LILLY AND CO	00002445685	ZYPREXA ZYDIS 20 MG TAB
ELI LILLY AND CO	00002445601	ZYPREXA ZYDIS 20 MG TABLET
ELI LILLY AND CO	00002445301	ZYPREXA ZYDIS 5 MG TABLET
ELI LILLY AND CO	00002445385	ZYPREXA ZYDIS 5 MG TABLET