

# **Pharmaceutical Marketing Disclosures**

**July 1, 2007 – June 30, 2008**

**Report of  
Vermont Attorney General  
William H. Sorrell**

**April 2009**

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**Pharmaceutical Marketing Disclosures: Report of  
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**I. Executive Summary**

This is the sixth report of Vermont Attorney General William H. Sorrell on Pharmaceutical Marketing Disclosures. It is based upon disclosures of payments made during the period July 1, 2007, through June 30, 2008 (“FY08”) by pharmaceutical marketers on consulting and speaker fees, travel expenses, gifts, and other payments to or for physicians, hospitals, universities and others authorized to prescribe or dispense pharmaceutical products. Vermont’s Pharmaceutical Marketing Disclosure Law, [18 V.S.A. § 4632](#), requires manufacturers to file the disclosures with the Vermont Attorney General’s Office by December 1<sup>st</sup> following the fiscal year, and requires the Vermont Attorney General to issue a report about the disclosures.

As this report demonstrates, the Pharmaceutical Marketing Disclosure Law in Vermont provides useful information regarding pharmaceutical manufacturer’s distribution of money within the Vermont medical community to market pharmaceuticals. According to the FY08 disclosures, 78 pharmaceutical manufacturers reported spending \$2,935,248 in Vermont on fees, travel expenses, and other direct payments to Vermont physicians, hospitals, universities and others for the purpose of marketing their products. There were 115 pharmaceutical manufacturers who filed disclosures in FY08, with 37 of these manufacturers reporting no expenditures.

From FY04 through FY08, there has been an increase of over 40% in the number of manufacturers who have reported marketing expenditures, and a decrease of nearly 30% in the amount of expenditures.

The top five spenders in Vermont on marketing during FY08 were:

- Eli Lilly and Company
- Pfizer, Inc.
- Novartis Pharmaceuticals Corporation
- Merck & Co., Inc., and
- Forest Pharmaceuticals, Inc.

Over the last three years, the percentage of payments reported by the top five spenders, as compared with the total amount of expenditures reported, has dropped from 59% to 56% to 52% in FY08.

Nearly \$1,770,000 was expended on the top 100 individual recipients in FY08. Thus, with approximately 2280 recipients, 4.3 % of the recipients received 60% of the total payments in that year. The greatest amount of expenditures went to psychiatrists as a group, totaling nearly half a million dollars; one psychiatrist received over \$112,000, the greatest amount of pharmaceutical marketing dollars spent on any single person in FY08.

In addition to psychiatry, the following groups of specialists received over \$100,000 in expenditures: internal medicine; neurology; endocrinology, diabetes and metabolism; and ionizing radiation privileges.

Individual specialists in geriatric medicine and in endocrinology, diabetes and metabolism, received the highest average expenditures for the top 100 recipients, each averaging over \$50,000. Specialists in family practice, pediatrics, OBGYN, gastroenterology, and colon and rectal surgery received the lowest average expenditures in the top 100 recipients, each with an average expenditure of less than \$6,500.

Seven individuals in the top 100 recipients were not physicians, but were physician's assistants, registered nurses, or advance practice registered nurses.

Nearly 50% of all marketing expenditures reported in FY08 were for speaker fees or other payments to recipients, nearly a quarter were for marketing of pharmaceutical products, and approximately a fifth were for educational purposes. Nearly 60% were direct payments to recipients in the form of cash or check.

Expenditures on food totaled over \$860,000, or nearly 30% of all marketing expenditures. Of all recipients of food in FY08, more than 20% had over \$500 expended on them, including more than 11% who had over \$1000 expended on them. Approximately 40% of all recipients of food received food valued at less than \$100. The individual recipient with the greatest reported food expenditure received nearly \$15,800 in food for him or herself and any non-prescribing colleagues.

In FY08, the drug for which the greatest marketing was expended was for attention-deficit/hyperactivity disorder (ADHD). Looking only at the 50 drugs with the greatest expenditures, nearly 15% of those expenditures went for marketing drugs used for controlling diabetes, nearly twice as much as was spent on the promotion of the next closest drugs, which were for the treatment of hypertension, depression, and ADHD. Nearly 70% of the total expenditures for FY08 was spent on the top 13% of all drugs marketed.

From FY06 through FY08, the percentage of information fields declared to be trade secret increased from 63% to 74%, and the percentage of payments declared to be trade secret increased from 72% to 83%. Click [here](#) for the public data upon which this report is based.

## **II. Description of Vermont's Pharmaceutical Marketing Disclosure Law**

The Vermont Legislature enacted the Pharmaceutical Marketing Disclosure Law in 2002, and amended it in 2004, 2005, 2006, and 2007. The law requires pharmaceutical manufacturers to report to the Vermont Attorney General, on forms and in a manner prescribed by the Attorney General, marketing payments made to persons in Vermont who are authorized to prescribe, dispense, or purchase pharmaceutical products. In particular, the law requires every pharmaceutical manufacturer to disclose:

the value, nature, and purpose of any gift, fee, payment, subsidy, or other economic benefit provided in connection with detailing, promotional, or other marketing activities by the company, directly or through its pharmaceutical marketers, to any physician, hospital, nursing home, pharmacist, health benefit plan administrator, or any other person in Vermont authorized to prescribe, dispense, or purchase prescription drugs in this state.

18 V.S.A. § 4632(a)(1).

Exempted by statute from disclosure are the following:

- Free samples of prescription drugs intended for distribution to patients;
- Payment of reasonable compensation and reimbursement of expenses in connection with bona fide clinical trials;
- Any gift, fee, payment, subsidy, or other economic benefit the value of which is less than \$25.00;
- Scholarship or other support for medical students, residents, and fellows to attend a significant educational, scientific, or policy-making conference of a national, regional, or specialty medical or other association if the recipient of the scholarship or other support is selected by the association; and
- Prescription drug rebates and discounts.

18 V.S.A. § 4632(a)(4).

The Pharmaceutical Marketing Disclosure Law prohibits the Attorney General from disclosing information that constitutes “trade secrets” under Vermont’s Access to Public Records Law, [1 V.S.A. § 317\(c\)\(9\)](#). 18 V.S.A. § 4632(a)(3). The disclosure form permits the company to identify any information that it claims is a trade secret. If trade secret information is requested, the Attorney General shall notify the pharmaceutical company, which shall respond within 30 days by consenting to the release of the information or certifying the reasons for its claim of trade secret. The requester may then apply to the Washington County Superior Court for a declaration that the claim is invalid. The Attorney General is not a party to that action and shall keep the information confidential until the court action is resolved.

### **III. Amendments to Marketing Disclosure Reports**

In the past, the Attorney General’s Office has revised summaries of expenditures for prior reporting periods to account for late or corrected filings by some manufacturers. Such was the case for the report of FY06, but not for the report of FY07.

This year’s report has far fewer comparisons across years than in the past because the data for FY08 was corrected by the Attorney General’s Office to a far greater degree than occurred in the past. Where needed, submissions regarding nature of payment and purpose of payment were corrected after consultation with the reporting company. Corrections as to type of health care provider (physicians to RNs or RNs to physicians, for example) were made based on the type of license held by the recipient without consultation with the pharmaceutical companies.

### **IV. Summary of Pharmaceutical Marketing Expenditures**

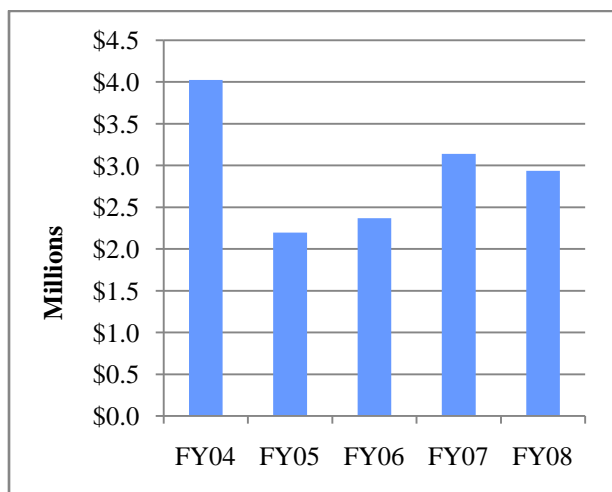
The Attorney General’s Office has organized the data submitted by pharmaceutical manufacturers in seven ways:

1. Total payments of each pharmaceutical manufacturer;
2. Payments organized by recipient type;
3. Payments organized by prescriber specialty for the top 100 individual recipients;
4. Payments organized by marketing expenditures for specific drugs and indications;
5. Payments organized by nature of expenditure;
6. Payments organized by purpose of expenditure; and
7. Trade secret declarations.

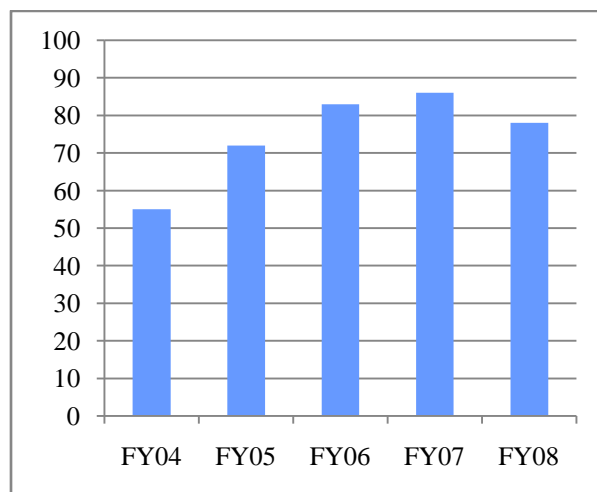
## 1. Total Payments of Each Pharmaceutical Manufacturer

During the period July 1, 2007, through June 30, 2008 (“FY08”), 78 pharmaceutical manufacturers reported spending \$2,935,248 in Vermont on fees, travel expenses, and other direct payments or gifts to or for Vermont physicians, hospitals, universities and others for the purpose of marketing their products. A total of 115 pharmaceutical manufacturers filed disclosures in FY08, with 37 of these manufacturers reporting no expenditures.

As the following graphs show, from FY04 through FY08, there has been a decrease of nearly 30% in the amount of expenditures and an increase of over 40% in the number of manufacturers who have reported marketing expenditures.



Graph 1. Total expenditures (in millions), FY04-FY08.



Graph 2. Number of companies reporting expenditures, FY04-FY08.

The table below shows the spending of the five companies that reported the greatest expenditures for marketing in the last three fiscal years. (Each fiscal year runs from July 1 through June 30, and is identified by the latter year). The list of all companies, ranked by amount of total expenditures for FY08, are attached in the Appendix.

Ranking	FY06	FY07	FY08
1	Eli Lilly	Eli Lilly	Eli Lilly
2	Sanofi Aventis	Pfizer	Pfizer
3	Pfizer	UCB	Novartis Pharmaceuticals
4	Forest Pharmaceuticals	Novartis Pharmaceuticals	Merck
5	Novartis Pharmaceuticals	Merck	Forest Pharmaceuticals



Total expenditures for top 5	\$1,326,075.24	\$1,756,150.56	\$1,519,745.18
Average expenditure for each of top 5	\$265,215.05	\$351,230.11	\$303,949.04
Top 5's percentage of total expenditures	59%	56%	52%

Table 1. Marketing expenditures of five companies with highest expenditures, FY06-FY08.

## 2. Payments Organized by Recipient Type

There are 10 categories of licensed professionals authorized to prescribe in Vermont: advance practice registered nurses (commonly known as nurse practitioners); dentists; naturopathic physicians; optometrists; osteopaths; physicians; physician's assistants; podiatrists; scientific investigators; and veterinarians. The Vermont Secretary of State and the Medical Practice Board currently list 4,573 physicians, osteopaths, PAs and APRNs licensed to prescribe pharmaceuticals in Vermont.<sup>1</sup>

The table below sets out how the payments made in FY08 were distributed among all categories of recipients.

Recipient Type	Total Received	Percentage of Total
Doctor	\$2,118,543.50	72.18
Other Healthcare Provider <sup>2</sup>	\$289,773.75	9.87
University	\$250,416.88	8.53
Other Prescriber	\$160,301.60	5.46
Hospital	\$68,544.90	2.34
Clinic	\$24,682.53	0.84
Pharmacist/Pharmacy Technician	\$22,985.22	0.78

Table 2. Distribution of expenditures by recipient type, FY08.

## 3. Payments Organized by Prescriber Specialty for the Top 100 Individual Recipients

Vermont doctors are allowed to self-report specialties. Below is the marketing data analyzed for payments made to the top 100 recipients organized by self-reported specialty of those licensees. The averages provided are only for specialists in the top 100, not for all specialists in that group.

A total of \$1,768,184.91 in FY08 was expended on the top 100 individual recipients. Thus, 4.3 % of recipients received 60% of the total payments in that year. The top 100 includes 11

<sup>1</sup> An unknown number of the physicians and osteopaths included in the 4,573 figure are on limited temporary licenses which do not allow them to prescribe.

<sup>2</sup> PAs, APRNs, RNs, LPNs, dentists, podiatrists, optometrists and opticians. RNs and LPNs cannot prescribe drugs in Vermont. Data on expenditures to or for RNs and LPNs is included in this report because some pharmaceutical companies neglected to associate the expenditures with a licensed prescriber as is required by the Attorney General's guidance.

psychiatrists, who together received nearly half a million dollars. One practitioner of geriatric medicine received over \$50,000. Three specialists in endocrinology and diabetes were in the top 100, and together those 3 doctors received over \$150,000.

Specialists in family practice, pediatrics, OBGYN, gastroenterology, and colon and rectal surgery received the lowest average expenditures in the top 100 recipients, each with an average expenditure of less than \$6,500.

<b>Specialty #1 Description (as self-reported)/Credentials</b>	<b>Number of Recipients</b>	<b>Total Received</b>	<b>Average per Recipient</b>
Psychiatry	11	\$479,306.19	\$43,573.29
Internal Medicine	23	\$332,880.14	\$14,473.05
Neurology	8	\$185,007.43	\$23,125.93
Endocrinology, Diabetes + Metabolism	3	\$156,832.36	\$52,277.45
Ionizing Radiation Privileges	9	\$111,326.98	\$12,369.66
Osteopath	5	\$87,279.16	\$17,455.83
Family Practice	11	\$70,055.37	\$6,368.67
APRN	4	\$51,926.25	\$12,981.56
Geriatric Medicine	1	\$51,672.20	\$51,672.20
RN	2	\$43,418.41	\$21,709.21
Allergy and Immunology	2	\$38,324.43	\$19,162.22
Pediatrics	6	\$37,118.15	\$6,186.36
Oncology, Medical	2	\$24,559.42	\$12,279.71
Dermatology	1	\$15,190.14	\$15,190.14
Urology	2	\$14,134.58	\$7,067.29
Physical Medicine and Rehabilitation	1	\$12,501.48	\$12,501.48
Nephrology	1	\$11,361.87	\$11,361.87
Other	1	\$9,307.90	\$9,307.90
Cardiovascular Disease	1	\$8,680.34	\$8,680.34
Neurophysiology, Clinical	1	\$7,246.02	\$7,246.02
P.A.	1	\$6,025.74	\$6,025.74
Gastroenterology	2	\$5,209.76	\$2,604.88
OBGYN	1	\$4,711.61	\$4,711.61
Surgery, Colon and Rectal	1	\$4,109.00	\$4,109.00
<b>Total</b>	<b>100</b>	<b>\$1,768,184.93</b>	<b>\$382,441.41</b>

Table 4. Expenditures for top 100 recipients by specialty, FY08.

One physician, whose self-identified specialty is psychiatry, had over \$112,000 expended on him or her, the greatest amount of pharmaceutical marketing dollars spent on any single Vermont prescriber in FY08. The monies came from four pharmaceutical companies, with nearly 92% from one company, nearly 93% in the form of cash or check, and over 90% for speaker fees or payments.

Three categories of non-physicians are listed in the top 100 individual recipients. The top 100 recipients include four advance practice registered nurses (nurse practitioners), two registered nurses, and one physician's assistant. Together these 7 individuals received 5.7% of the total amount received by the top 100 recipients, and 3.5% of the total for expenditures in Vermont in FY08.

<b>Credentials</b>	<b>Number of Recipients</b>	<b>Total Received</b>	<b>Percentage of Total for top 100</b>	<b>Average per Recipient</b>
APRN	4	\$51,926.25	2.90%	\$12,981.56
RN	2	\$43,418.41	2.40%	\$21,709.21
P.A.	1	\$6,025.74	0.34%	\$6,025.74
Total	7	\$101,370.39	5.7%	\$40,716.51

Table 5. Expenditures for APRNs, RNs and Physician’s Assistants in top 100 recipients, FY08.

#### 4. Payments Organized by Marketing Expenditures for Specific Drugs and Indications

In FY08, pharmaceutical manufacturers reported spending over \$2.5 million for marketing more than 350 specific drugs in Vermont. The table below ranks the top 20 drugs marketed in Vermont in FY08. The “indications” are the primary purposes of the drug according to the manufacturer’s website for the drug. For the Food and Drug Administration’s description of each drug’s approved uses, see: [www.fda.gov/cder/drug/DrugSafety/DrugIndex.htm](http://www.fda.gov/cder/drug/DrugSafety/DrugIndex.htm) and [www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm](http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm).

As Table 6 shows, Strattera, a drug for ADHD, was the drug for which the greatest number of marketing dollars were spent in FY08. Expenditures for the next seven top ranked drugs covered only three indications: depression, Alzheimer’s, and diabetes.

<b>Drug Name</b>	<b>Pharmaceutical Manufacturer</b>	<b>Indications</b>	<b>Ranking</b>
Strattera	Eli Lilly	ADHD	1
Cymbalta	Eli Lilly	Depression, Neuropathic Pain, Anxiety Disorder	2
Exelon	Novartis Pharmaceuticals Corporation	Alzheimer’s, Parkinson’s	3
Januvia	Merck & Co., Inc.,	Diabetes	4
Lexapro	Forest Pharmaceuticals, Inc.	Depression, Anxiety Disorder	5
Lantus	Sanofi Aventis	Diabetes, Type 1 and 2	6
Levemir®	Novo Nordisk	Diabetes, Type 1 and 2	7
Namenda	Forest Pharmaceuticals, Inc.	Alzheimer’s	8
Lipitor	Pfizer, Inc.	Cholesterol	9
Lyrica	Pfizer, Inc.	Pain	10
Angiomax	The Medicines Company	Anticoagulant	11
Symbicort	AstraZeneca	Asthma	12
Geodon	Pfizer, Inc.	Bi-Polar and Schizophrenia	13
NovoLog®	Novo Nordisk	Diabetes	14
NovoLog® Mix 70/30	Novo Nordisk	Diabetes, Hyperglycemia	15
Betaseron	Bayer Healthcare Pharmaceuticals	M.S.	16
Diovan	Novartis Pharmaceuticals Corporation	Hypertension	17
Janumet	Merck & Co., Inc.,	Diabetes, Type 1	18

Humira	Abbott	Rheumatoid Arthritis; Juvenile Idiopathic Arthritis, Crohn's Disease, Plaque Psoriasis	19
Tekturna	Novartis Pharmaceuticals Corporation	Hypertension	20

Table 6. Ranking of 20 drugs with greatest expenditures, FY08.

Table 7 shows that of the 50 drugs most heavily marketed in Vermont in FY08 (not just the 20 drugs included in Table 6), \$432,140.17, or nearly 15% of the total amount reported for all drugs, was spent on marketing drugs used for controlling diabetes. Nearly twice as much was spent on the promotion of diabetes drugs as for each of the next closest drugs, which are for treatment of hypertension, depression, and ADHD. The amount spent on the top 13% of drugs (the top 50) was nearly 70% of the expenditures for all drugs in FY08.

<b>Indications</b>	<b>Total Received</b>
Diabetes	\$445,303.55
Hypertension	\$259,220.41
Depression	\$242,730.07
ADHD	\$217,983.72
Alzheimer's	\$188,966.05
Cholesterol	\$163,450.25
M.S.	\$124,341.09
Bi-Polar and Schizophrenia	\$76,605.66
Pain, Seizures, Fibromyalgia	\$58,568.93
Anticoagulant	\$54,661.22
Asthma	\$53,903.52
Rheumatoid Arthritis; Juvenile Idiopathic Arthritis, Crohn's Disease, Plaque Psoriasis	\$40,008.99
C.O.P.D.	\$34,824.52
Allergy	\$30,218.92
Multiple Myeloma, Mantle Cell Lymphoma	\$27,767.00
Stroke	\$23,110.66
BPH	\$20,610.66
Sleep Aid	\$20,436.33
Osteoporosis	\$20,097.73
D.V.T.	\$18,117.00
<b>Total</b>	<b>\$2,120,926.28</b>

Table 7. Expenditures by indication of 50 drugs with greatest expenditures, FY08.

Note: When pharmaceutical manufacturers disclosed one payment for marketing several different drugs, the Attorney General's Office allocated the entire payment to each of the drugs that were marketed through the payment.

## 5. Payments Organized by Nature of Expenditure

"Nature" of marketing expenses, as set forth in the Pharmaceutical Marketing Disclosure Law, means a description of the kinds of payments or benefits that were provided. Examples of the nature of

expenditures include cash, checks, donations, or other direct payments to a recipient; payments for food and beverages; payments for lodging and other travel expenses; and gifts, such as books and other items.

Direct payments to recipients in the form of cash or check was the area of greatest expenditures, totally nearly 60% of all marketing expenditures reported in FY08.

<b>Nature of Payment</b>	<b>Number of Payments</b>	<b>Total Paid</b>	<b>Percentage of Total Expenditures</b>
Cash or Check	1606	\$1,736,677.03	59.17
Food	13275	\$861,911.70	29.36
Grant	39	\$218,619.08	7.45
Lodging/Transportation	208	\$55,449.89	1.89
Book	336	\$24,818.02	0.85
Other	153	\$14,453.49	0.49
Gift	229	\$13,469.16	0.46
Donation	8	\$9,850.00	0.34

Table 8. Expenditures by nature of payment, FY08.

Expenditures on food in FY08 totaled over \$860,000, or nearly 30% of all marketing expenditures. Of all recipients of food during FY08, over 11% had more than \$1000 expended on them, over 20% had more than \$500, and nearly 60% had more than \$100 expended on them for food. Thus approximately 40% of all recipients received food valued at less than \$100.

The table below ranks the top 20 recipients of food payments for FY08 by the recipient's specialty. Nearly \$15,800 was expended on the individual recipient with the greatest food expenditure. (Under the Attorney General's guidelines, some of the expenditures could have been for non-prescribing colleagues in the same practice.) The payments to this individual were reported by 25 different companies, with 35 days for which more than one payment was made.

<b>Recipient's Specialty</b>	<b>Number of Reports of Food Expenditures</b>	<b>Total Received</b>	<b>Ranking</b>
Internal Medicine	223	\$15,793.78	1
Family Practice	149	\$11,271.15	2
Internal Medicine	127	\$8,243.46	3
Ionizing Radiation Privileges	78	\$8,154.71	4
Family Practice	138	\$8,149.45	5
Psychiatry	75	\$6,320.66	6
Family Practice	80	\$6,237.95	7
Internal Medicine	70	\$6,211.74	8
Family Practice	83	\$6,029.24	9
P.A.	100	\$5,947.74	10
Internal Medicine	118	\$5,814.19	11
Ionizing Radiation Privileges	84	\$5,814.12	12
P.A.	97	\$5,574.72	13
Internal Medicine	65	\$5,353.51	14

Family Practice	90	\$5,348.21	15
Ionizing Radiation Privileges	56	\$5,306.99	16
A.P.R.N.	75	\$5,299.92	17
P.A.	69	\$5,182.64	18
Internal Medicine	81	\$5,009.92	19
Family Practice	92	\$5,005.66	20

Table 9. Expenditures on food for the top 20 individual recipients of food, FY08.

## 6. Payments Organized by Purpose of Expenditure

“Purpose” of marketing expenses, as set forth in the Pharmaceutical Marketing Disclosure Law, means a description of the purpose of the payments or benefits that were provided. Examples of the purpose of expenditures include speaker fees, consulting fees, education, and marketing or “detailing” the specific virtues of a pharmaceutical product.

Nearly 50% of all marketing expenditures were for speaker fees or other payments to recipients; nearly a quarter of all payments were for marketing of pharmaceutical products, and approximately a fifth were for educational purposes.

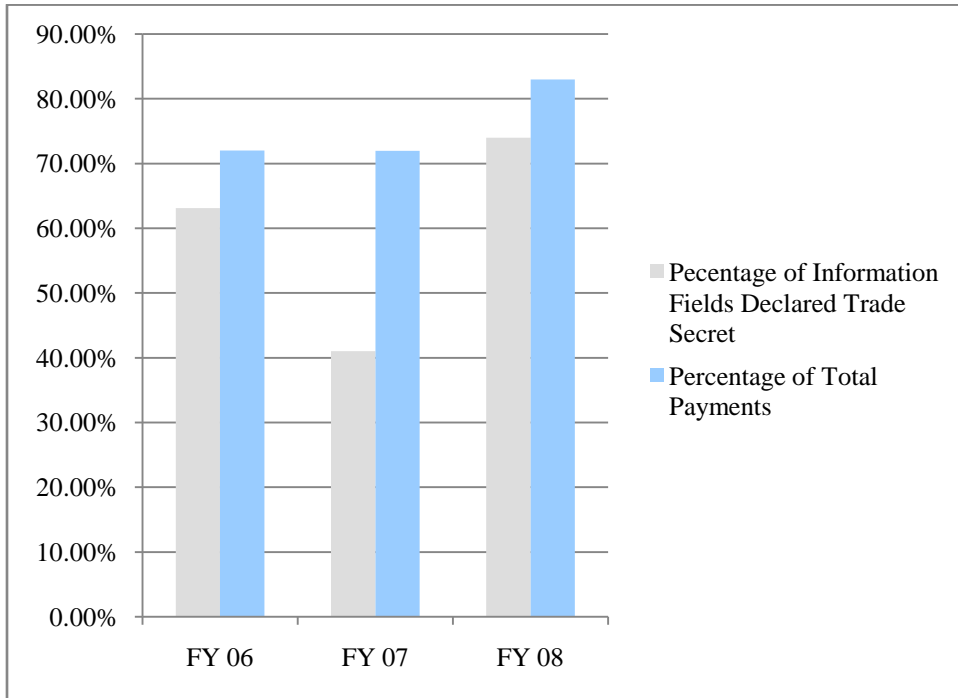
Primary Purpose	Number of Payments Made	Total Paid	Percentage of Total Expenditures
Speaker Fee or Payment	1584	\$1,415,314.87	48.22
Marketing	9846	\$673,193.73	22.93
Education (other)	4069	\$329,774.19	11.23
Education CME Grants	61	\$281,207.08	9.58
Consulting	179	\$205,372.30	7.00
Other	120	\$30,386.21	1.04

Table 10. Primary purposes of expenditures, FY08.

## 7. Trade Secret Declarations

Thirty-seven of the seventy-eight pharmaceutical manufacturers that disclosed payments in FY08 requested that some or all of their data be listed as “trade secret”. The total of payments made by these companies is \$ 2,427,594.00, which represents 83% of the total payments made during this reporting period.

A comparison of trade secret designations in FY06 through FY08 is as follows:



Graph 3. Percentages of trade secret designations, FY06-FY08.

**FY08 - Ranking by Company Name  
(Johnson and Johnson subsidiaries combined)**

<i>Company</i>	<b>Ranking</b>
Eli Lilly and Company.....	1
Pfizer, Inc.....	2
Novartis Pharmaceuticals Corporation.....	3
Merck & Co., Inc. and Merck Schering Plough.....	4
Forest Pharmaceuticals, Inc. (subsidiary of Forest Laboratories, Inc.).....	5
sanofi aventis US LLC.....	6
GlaxoSmithKline.....	7
AstraZeneca.....	8
Takeda Pharmaceuticals America, Inc.....	9
Abbott.....	10
Novo Nordisk, Inc.....	11
Johnson and Johnson Companies *.....	12
The Medicines Company.....	13
Bayer Healthcare Pharmaceuticals, Inc.....	14
UCB, Inc.....	15
EMD Serono, Inc.....	16
Boehringer Ingelheim Pharmaceuticals, Inc.....	17
Daiichi-Sankyo, Inc.....	18
Procter & Gamble Pharmaceuticals, Inc.....	19
Schering-Plough.....	20
Hoffmann-La Roche, Inc.....	21
Wyeth Pharmaceuticals.....	22
Bristol-Myers Squibb Company.....	23
Amgen, Inc.....	24
Millennium Pharmaceuticals, Inc.....	25
Biogen Idec, Inc.....	26
Shire Pharmaceuticals, Inc.....	27
Actelion Pharmaceuticals US, Inc.....	28
Cephalon, Inc.....	29
Sepracor, Inc.....	30
Allergan, Inc.....	31
Teva Pharmaceuticals.....	32
Genentech, Inc.....	33
Reckitt Benckiser Pharmaceuticals.....	34
Alcon Laboratories, Inc.....	35
Hospira, Inc.....	36
Astellas Pharma US, Inc.....	37
Sanofi Pasteur, Inc.....	38
Onyx Pharmaceuticals, Inc.....	39
Salix Pharmaceuticals, Inc.....	40



Reliant Pharmaceuticals.....	41
Endo Pharmaceuticals, Inc.....	42
Dey L.P. ....	43
Duramed Pharmaceuticals, Inc. a subsidiary of Barr Pharmaceuticals .....	44
Solvay Pharmaceuticals, Inc. ....	45
Abraxis Bioscience LLC.....	46
Baxter Healthcare Corporation .....	47
Acorda Therapeutics, Inc. ....	48
Meda Pharmaceuticals, Inc. ....	49
Alpharma Pharmaceuticals, LLC.....	50
Eisai, Inc. / Eisai Corporation of North America.....	51
Enzon Pharmaceuticals, Inc. ....	52
MedImmune.....	53
Solstice Neurosciences, Inc. ....	54
King Pharmaceuticals, Inc. ....	55
MGI Pharma, Inc. / Eisai Corporation of North America.....	56
Watson Pharma, Inc. (Watson Pharmaceuticals, Inc.).....	57
Cubist Pharmaceuticals, Inc.....	58
Amylin Pharmaceuticals, Inc. ....	59
Alkermes, Inc. ....	60
Purdue Pharma L.P. ....	61
Tibotec Therapeutics, a division of Ortho-Biotech Products L.P. ....	62
Intendis, Inc.....	63
Valeant Pharmaceuticals.....	64
CSL Behring LLC.....	65
Stiefel Laboratories, Inc.....	66
Genzyme Corporation.....	67
Jazz Pharmaceuticals, Inc. ....	68
Talecris Biotherapeutics, Inc. ....	69
WARNER CHILCOTT .....	70
UDL Laboratories, Inc. ....	71
Graceway Pharmaceuticals LLC.....	72

**Companies with nothing to report.**

(OSI) Eyetech, Inc. (subsidiary of OSI Pharmaceuticals Inc.)  
Alexion Pharmaceuticals, Inc.  
Axcan Pharma US, Inc.  
B. Braun Medical, Inc.  
Barr Laboratories a subsidiary of Barr Pharmaceuticals, Inc. 225  
BioMarin Pharmaceutical, Inc.  
CV Therapeutics, Inc.  
DENTSPLY Pharmaceutical  
Elan Pharmaceuticals, Inc.  
ETHEX Corporation  
Eyetech, Inc.  
Fresenius Medical Care North America

Galderma Laboratories L.P.  
 GE HealthCare  
 Gilead Sciences, Inc.  
 GTx, Inc.  
 ImClone Systems Corporation f/k/a ImClone Systems, Inc.  
 KV Pharmaceuticals / Ther-Rx Corporation  
 Mallinckrodt, Inc.  
 Novartis Vaccines and Diagnostics, Inc.  
 Noven Therapeutics LLC a subsidiary of Noven Pharmaceuticals, Inc.  
 Novogyne Pharmaceuticals  
 Odyssey Pharmaceuticals, Inc. a subsidiary of Barr Pharmaceuticals  
 Otsuka America Pharmaceutical, Inc.  
 Ovation Pharmaceuticals, Inc.  
 Par Pharmaceutical, Inc.  
 Patriot Pharmaceuticals LLC  
 Pliva, Inc. a subsidiary of Barr Pharmaceuticals, Inc.  
 Santarus, Inc.  
 Sciele Pharma, Inc.  
 Synergy Medical Education  
 Upsher-Smith Laboratories, Inc.

\* Johnson and Johnson Companies: Centocor, Inc., Ethicon Inc., Janssen L.P., McNeil Pediatrics, Ortho Clinical Diagnostics, Ortho Womens Health and Urology, Ortho-Biotech Products L.P., Ortho-McNeil Neurologics, OrthoNeutrogena, PriCara, Scios, Inc., Vistakon Pharmaceuticals LLC

TOTAL.....	\$2,935,248.3
Number of companies without Johnson and Johnson reporting expenditures .....	71
Number of Johnson and Johnson companies reporting expenditures .....	7
<b>Total Number of Companies Reporting Expenditures.....</b>	<b>78</b>
Number of companies without Johnson and Johnson with no expenditures.....	32
Number of Johnson and Johnson companies with no expenditures.....	5
<b>Total Number of Companies.....</b>	<b>115</b>