



UCB, Inc. – 1950 Lake Park Drive – Smyrna, Georgia 30080

January 3, 2024

**BY ELECTRONIC DELIVERY**

State of Vermont  
Office of the Vermont Attorney General  
109 State Street  
Montpelier, VT 05609  
[AGO.highcostprescriptiondrugs@vermont.gov](mailto:AGO.highcostprescriptiondrugs@vermont.gov)

**RE: Notice of a New Prescription Drug Pursuant to 18 V.S.A. § 4637(c)**

Dear Office of the Vermont Attorney General,

UCB, Inc. (“UCB”) is issuing this notice pursuant to 18 V.S.A. § 4637(b), which requires prescription drug manufacturers to provide the Office of the Attorney General (the “Office”) written notice within three calendar days of releasing a drug in the commercial market whose Wholesale Acquisition Cost (“WAC”) exceeds the threshold set for a specialty drug under the Medicare Part D Program.

UCB released ZILBRYSQ<sup>®</sup> (zilucoplan) into the commercial market on January 3, 2024. ZILBRYSQ<sup>®</sup> is a complement inhibitor indicated for the treatment of generalized myasthenia gravis (gMG) in adult patients who are anti-acetylcholine receptor (AChR) antibody positive. ZILBRYSQ<sup>®</sup> WAC will exceed the threshold set for a specialty drug under the Medicare Part D Program.

18 V.S.A. § 4637 does not currently define “release of the drug in the commercial market.” Further, UCB is not aware of any guidance issued by the Office or any Vermont regulation that defines “release of the drug in the commercial market” for the purpose of 18 V.S.A. § 4637.

As a result and solely for purposes of this notice to the State of Vermont, UCB will consider its drug to be “release[d] . . . in the commercial market” when UCB notifies compendia of the new drug’s WAC.

Please note that the WAC-related information provided in this notice may be subject to change.

In the event Vermont S. 92 and the laws it implements, including 18 V.S.A. § 4637, are found invalid, UCB reserves all of its legal rights. By issuing this notice in an attempt to comply with

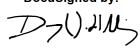


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18 V.S.A. § 4637, UCB does not waive any legal claims or legal rights related to potential constitutional defects with Vermont S. 92.

Please feel free to contact Heather Moss, Senior Analyst Government Pricing, at [Heather.Moss@ucb.com](mailto:Heather.Moss@ucb.com) if you have any questions and/or require any additional information.

Sincerely,

DocuSigned by:  
  
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Douglas J. Helling  
Associate General Counsel  
UCB, Inc.